



United States
Environmental Protection Agency
 Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Prime Source LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707	EPA File Symbol/Registration Number 89442-23
	Product Name Bifen 7.9SC Select
	Date of Confidential Statement of Formula (EPA Form 8570-4) 11/06/2020

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Bifenthrin

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement.

That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Bifenthrin		
Signature	Name and Title Ogongi Ogongi, Agent	Date 11/06/2020



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 89442-23	2. EPA Product Manager Jacquelyn Herrick	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Bifen 7.9SC Select	PM# 3	
5. Name and Address of Applicant (Include ZIP Code) Prime Source, a division of Albaugh LLC 1525 NE 36th Street Ankeny, IA 50021 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Proposed label amendment for Bifenthrin Case #7402 - Registration Review process

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
					<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					<input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 gal, 2.5 gal		5. Location of Label Directions <input checked="" type="checkbox"/> Attached to container	
6. Manner in Which Label is Affixed to Product		<input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Carolyn Miter		Title Registrations Specialist		Telephone No. (Include Area Code) 229-444-4914 (cell)	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature		3. Title Registrations Specialist 229-444-4914			
4. Typed Name Carolyn Miter carolynm@albaughllc.com		5. Date February 22, 2021			

February 22, 2021

Attn: Jacquelyn Herrick (PM 3)
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

Re: Albaugh LLC (089442)
Label Amendment: EPA Reg. No. 89442-23 – Bifen 7.9SC Select

Dear Ms. Herrick

Prime Source, a division of Albaugh LLC is submitting the enclosed application for label amendment for Bifen 7.9SC Select.

Prime Source is submitting this label amendment for the purpose of updating the label as required in the Interim Registration Review Decision for Bifenthrin as shown in tracked changes markings throughout the enclosed master label.

(File name: 089442-00023.20210222.DRAFT).

Please do not hesitate to contact me directly with any questions (919-740-9895).

Regards,

A handwritten signature in black ink, appearing to read "NPE", followed by a long horizontal line.

Nathan P. Ehresman
Regulatory Director, NA
Albaugh, LLC

 Environmental Protection Agency United States Washington, DC 20460	<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other:	OPP Identifier Number
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Application for Pesticide – Section I

1. Company/Product Number 89442-023	2. EPA Product Manager Jacquelyn Herrick	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Bifen 7.9SC Select	PM# 03	
5. Name and Address of Applicant (Include ZIP Code) Prime Source, a Division of Albaugh LLC c/o Albaugh LLC PO Box 2127 Valdosta, GA 31604-2127 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name: _____

Section – II

<input checked="" type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other - Explain below
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Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

The purpose of the submission is to allow for the use of additional [REDACTED] registered technical source.

Product ingredient source information may be entitled to confidential treatment

Section – III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2.5, 30, 220, 250, 266 gallon	
5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product		6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled	

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Kerly Pastor	Title Regulatory Manager	Telephone No. (Include Area Code) 229-221-8752
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Manager	
4. Typed Name Kerly Pastor kerlyp@albaughllc.com	4. Date May 18, 2021	

United States Environmental Protection Agency
Washington, D.C. 20460



Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Prime Source, a Division of Albaugh LLC c/o Albaugh LLC PO Box 2127 Valdosta, GA 31604-2127	EPA File Symbol/Registration Number 89442-23
	Product Name Bifen 7.9SC Select
	Date of Confidential Statement of Formula (EPA Form 8570-4) 05/18/2021

As an authorized representative of the applicant for registration of the product identified above, I here certify that:

(1) This product contains the following active ingredient(s):

Bifenthrin

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging of another product which contains that active ingredient, which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

(3) Indicate by checking (A) or (B) below which paragraph applies:



(A) An accurate Confidential Statement of Formula (EPA Form 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).


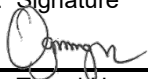
OR


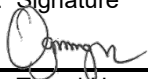


(B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Bifenthrin	[REDACTED]	[REDACTED]
Signature <i>Kerly Pastor</i>	Name and Title Kerly Pastor, Regulatory Manager	Date 05/18/2021

 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input checked="" type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 89442-23		2. EPA Product Manager Jacquelyn Herrick	
4. Company/Product (Name) Prime Source, LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select ABN: Lawn Pest Killer ABN: Ike's Farm, Home, Garden Lawn Pest Killer		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b) (I), my product is similar or identical in composition and labeling to: EPA Reg. No.: 53883-118 Product Name: Bifenthrin TC Insecticide/Termiticide	
Section - II			
<input checked="" type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below.			
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)			
Amendment adding Optional Marketing Statements and minor label revisions to match Me-Too.			
Section - III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No *Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 oz., 1 qt., 1, 2.5, 5 gallons	
5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product			
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Ogongi Ogongi		Title Authorized Agent	Telephone No. (Include Area Code) (302) 239-7369 (ogongi@wagnerreg.com)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Authorized Agent	
4. Typed Name Ogongi Ogongi		5. Date December 10, 2019	

 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input checked="" type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 89442-23		2. EPA Product Manager Jacquelyn Herrick	
4. Company/Product (Name) Prime Source, LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select ABN: Lawn Pest Killer ABN: Ike's Farm, Home, Garden Lawn Pest Killer		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b) (I), my product is similar or identical in composition and labeling to: EPA Reg. No.: 53883-118 Product Name: Bifenthrin TC Insecticide/Termiticide	
Section - II			
<input checked="" type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below.			
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) Amendment adding Optional Marketing Statements and minor label revisions to match Me-Too.			
Section - III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No *Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 oz., 1 qt., 1, 2.5, 5 gallons	
		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Ogongi Ogongi		Title Agent for Prime Source, LLC	Telephone No. (Include Area Code) (302) 239-7369 (ogongi@wagnerreg.com)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Agent for Prime Source, LLC	
4. Typed Name Ogongi Ogongi		5. Date November 05, 2019	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 17, 2015

Ms. Cheryl Wagner
Agent for Prime Source LLC
Wagner Regulatory Associates
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

Subject: CSF Notification per PRN 98-10 – Revised Basic CSF and Alternate CSFs 1 and 2
Product Name: Bifen 7.9SC Select
EPA Registration Number: 89442-23
Application Date: March 16, 2015
Decision Number: 502582

Dear Ms. Wagner:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The CSFs submitted with your application have been stamped "Notification" and placed in our files.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 03/16/2015
- Alternate CSF 1 dated 03/16/2015
- Alternate CSF 2 dated 03/16/2015
-

Any CSFs other than those listed above are superseded/no longer valid. If you have any questions, please contact Byron Backus 703-305-5704 or by email at backus.byron@epa.gov.

Sincerely,

Kable Bo Davis, Product Manager 3
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency

Washington, DC 20460

Registration

OPP Identifier Number	
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Amendment

Other

Application for Pesticide - Section I

1. Company/Product Number 89442-23	2. EPA Product Manager Mindy Ondish	3. Proposed Classification <input checked="" type="checkbox"/> None Restricted
4. Company/Product (Name) Prime Source LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select	PM# 25	
5. Name and Address of Applicant <i>(Include Zip Code)</i> Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name: <div style="text-align: right;">NOTIFICATION APR 17 2015</div>

Section - II

<input type="checkbox"/>	Amendment - Explain below.	<input type="checkbox"/>	Final printed labels in response to Agency letter dated _____
<input type="checkbox"/>	Resubmission in response to Agency letter dated _____	<input type="checkbox"/>	"Me Too" Application.
<input checked="" type="checkbox"/>	Notification - Explain below.	<input type="checkbox"/>	Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

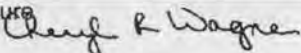
Notification to add additional producer to CSFs.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In: <div> <div> <div>Child-Resistant Packaging</div> <div> <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No </div> </div> <div> <div>Unit Packaging</div> <div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div> </div> <div> <div>Water Soluble Packaging</div> <div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div> </div> </div>				2. Type of Container <div> <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags </div>	
* Certification must be submitted		<div> <div>If "Yes"</div> <div>Unit Packaging wgt.</div> </div>	<div> <div>No. per container</div> </div>	<div> <div>If "Yes"</div> <div>Package wgt</div> </div>	<div> <div>No. per container</div> </div>
3. Location of Net Contents Information <div> <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container </div>		4. Size(s) Retail Container 1, 2.5, 5 gallons		5. Location of Label Directions <div> <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product </div>	
6. Manner in Which Label is Affixed to Product <div> <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled </div>		<div> <input type="checkbox"/> Other ___ adhesive backed label </div>			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Cheryl Wagner	Title Agent for Prime Source, LLC	Telephone No. (Include Area Code) (302) 635-7289 Cheryl@wagnerreg.com
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received <div style="text-align: center;">(Stamped)</div>
2. Signature 	3. Title Agent for Prime Source, LLC.	
4. Typed Name Cheryl Wagner	5. Date March 16 th , 2015	

resub. issien

Davis, Kable

From: Backus, Byron
Sent: Friday, April 17, 2015 12:40 PM
To: Davis, Kable
Subject: FW: Bifen 7.9SC Select CSF Notification EPA Reg. No. 89442-23.
Attachments: Bifen 7.9SC Select Alt 1 24Nov2014.doc; Bifen 7.9SC Select Alt 2 24Nov2014.doc

This email has the two corrected alternate CSFs.

From: Cheryl Wagner [mailto:cheryl@wagnerreg.com]
Sent: Thursday, April 16, 2015 3:34 PM
To: Backus, Byron
Subject: RE: Bifen 7.9SC Select CSF Notification EPA Reg. No. 89442-23.

Hi Byron,

Here is corrected alternates.

Sorry about that!!

Regards,

Cheryl Wagner
Wagner Regulatory Associates, Inc.
Telephone: (302) 635-7289
Fax: (302) 635-7295

From: Backus, Byron [mailto:Backus.Byron@epa.gov]
Sent: Thursday, April 16, 2015 2:21 PM
To: Cheryl Wagner
Subject: RE: Bifen 7.9SC Select CSF Notification EPA Reg. No. 89442-23.

OK so far but the two alternate CSFs still have an error in the lower limit for one of the "inerts." [Note: it's the last ingredient in the listing].

From: Cheryl Wagner [mailto:cheryl@wagnerreg.com]
Sent: Thursday, April 16, 2015 2:14 PM
To: Backus, Byron
Cc: Davis, Kable
Subject: RE: Bifen 7.9SC Select CSF Notification EPA Reg. No. 89442-23.

Hello,

Attached is the revised submission.

Regards,

Cheryl Wagner

Wagner Regulatory Associates, Inc.

Telephone: (302) 635-7289

Fax: (302) 635-7295

From: Backus, Byron [<mailto:Backus.Byron@epa.gov>]

Sent: Thursday, April 16, 2015 2:03 PM

To: Cheryl Wagner

Cc: Davis, Kable

Subject: Bifen 7.9SC Select CSF Notification EPA Reg. No. 89442-23.

In addition to the items noted in my previous email, could you also change the name of the product manager from Mindy Ondish to Kable Davis?

Again, if you have any questions, please contact Byron Backus at 703-305-5704 or by email at backus.byron@epa.gov.



Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

March 16th, 2015

Document Processing Desk (NOTIF)
ATTN: Mindy Ondish (PM 25)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Re: Bifen 7.9SC Select ABN: Bifen 7.9F Select, EPA Reg. No. 89442-23
Notification of Revised Confidential Statement of Formulas

Dear Ms. Ondish:

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, respectfully notifies the Agency that an additional production facility has been added to Box 2 of the Basic, Alternate 1, and Alternate 2 Confidential Statement of Formulas. These revised CSFs will replace all current EPA approved CSFs dated November 24th, 2014.

In support of this request, the following documents and studies are attached:

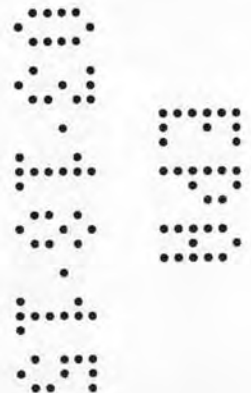
- Letter from Prime Source LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- 2 copies of the revised CSF

Please feel free to contact me via email at cheryl@wagnerreg.com or telephone at (302) 635-7289.

Respectfully submitted,

Cheryl Wagner
Agent for Prime Source LLC

Enclosures



Prime Source, LLC. 4609 E. Boonville-New Harmony Road, Evansville, IN 47725

U.S. Environmental Protection Agency
Office of Pesticide Programs (7505P)
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

State Pesticide Product Regulatory Agencies in the United States

Re: Designation of Agent for: Prime Source, LLC.

Dear Sir or Madam:

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to products that Prime Source, LLC will register with US EPA and state regulatory authorities. Prime Source, LLC hereby authorizes EPA and state regulatory authorities to contact any of the following individuals within WRA, Inc.:

EPA Contacts (Any of the following individuals may be contacted by EPA on our behalf)

James M. Wagner
Managing Director
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7290
Fax: (302) 635-7295
Email: james@wagnerreg.com

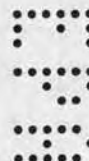
Cheryl R. Wagner
President
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Lori Kohler
Regulatory Associate
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7281
Fax: (302) 635-7295
Email: lori@wagnerreg.com

State Contacts (Any of the following individuals may be contacted by state regulatory authorities on our behalf)

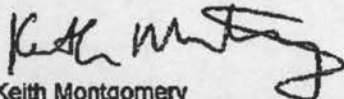
Barbarette Young-Henry
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7279
Fax: (302) 635-7295
Email: Barbarette@wagnerreg.com

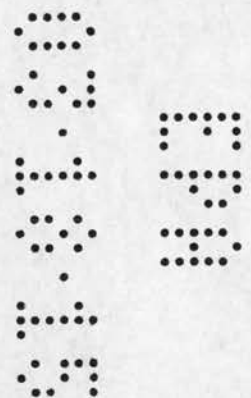
Cheryl Wagner
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com



Authorization to contact these staff members within WRA, Inc remains in effect until such time that Prime Source, LLC provides notification in writing of any changes.

Respectfully submitted,


Keith Montgomery
Sales Manager





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 10, 2015

Cheryl Wagner
Prime Source, LLC
c/o Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707

Subject: Label Notification per PRN 98-10 – Add Alternate Brand Name
Product Name: BIFEN 7.9SC SELECT
EPA Registration Number: 89442-23
Application Date: February 27, 2015
Decision Number: 500551

Dear Ms. Wagner:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

The alternate brand name **Bifen 7.9F Select** has been added to the product record.

If you have any questions, please contact Maggie Rudick at 703-347-0257 or by email at rudick.maggie@epa.gov.

Sincerely,

Maggie Rudick
for

Kable Bo Davis, Product Manager 3
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

February 27th, 2015

Document Processing Desk (NOTIF)
ATTN: Mindy Ondish (PM 25)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

Re: Bifen 7.9SC Select, EPA Registration No. 89442-23 - Notification of Alternate Brand Name

Dear Ms. Ondish:

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, is submitting a notification of an alternate brand name – **Bifen 7.9F Select**. In support of this request, the following documents and studies are attached:

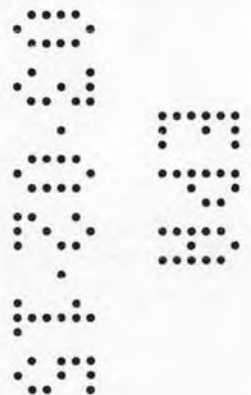
- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- A copy of the label

Please feel free to contact me via email at cheryl@wagnerreg.com or telephone at (302) 635-7289

Respectfully submitted,

Cheryl Wagner
Agent for Prime Source LLC

Enclosures





United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 89442-23	2. EPA Product Manager Mindy Ondish	3. Proposed Classification <input checked="" type="checkbox"/> None Restricted
4. Company/Product (Name) Prime Source LLC / Bifen 7.9SC Select	PM# 25	
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Notification of Alternate Brand Name - Bifen 7.9F Select

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt. container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
--	--	--	---

* Certification must be submitted

3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 1, 2.5, 5 gallons	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other ___ adhesive backed label _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Cheryl Wagner	Title Agent for Prime Source, LLC	Telephone No. (Include Area Code) (302) 635-7289 Cheryl@wagnerreg.com
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <i>Cheryl R. Wagner</i>	3. Title Agent for Prime Source, LLC.	
4. Typed Name Cheryl Wagner	5. Date February 27 th , 2015	

Prime Source, LLC. 4609 E. Boonville-New Harmony Road, Evansville, IN 47725

U.S. Environmental Protection Agency
Office of Pesticide Programs (7505P)
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

State Pesticide Product Regulatory Agencies in the United States

Re: Designation of Agent for: Prime Source, LLC.

Dear Sir or Madam:

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to products that Prime Source, LLC will register with US EPA and state regulatory authorities. Prime Source, LLC hereby authorizes EPA and state regulatory authorities to contact any of the following individuals within WRA, Inc.:

EPA Contacts (Any of the following individuals may be contacted by EPA on our behalf)

James M. Wagner
Managing Director
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7290
Fax: (302) 635-7295
Email: james@wagnerreg.com

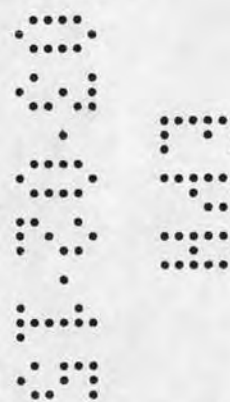
Cheryl R. Wagner
President
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Lori Kohler
Regulatory Associate
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7281
Fax: (302) 635-7295
Email: lori@wagnerreg.com

State Contacts (Any of the following individuals may be contacted by state regulatory authorities on our behalf)

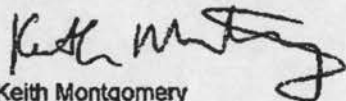
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Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

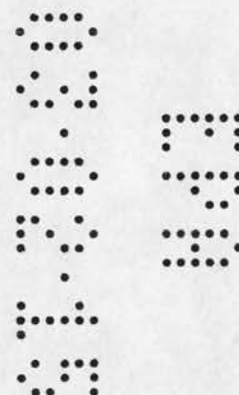


Authorization to contact these staff members within WRA, Inc remains in effect until such time that Prime Source, LLC provides notification in writing of any changes.

Respectfully submitted,



Keith Montgomery
Sales Manager





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Note to File

Date: February 11, 2015

File Symbol: 89442-EG

Decision Number: 497710

PM/RM: Kable Davis/Julie Chao

A handwritten signature in black ink, appearing to read "Julie Chao", is written over the printed name.

Background: The Similarity Clinic Memorandum signed on 12/12/14 states that the subject product is not substantially similar to EPA Reg. No. 53883-117, the cited product. However, further review of the product files reveals that the subject product is, in fact, identical to the cited product. The Similarity Clinic Memorandum also indicates that Child Resistant Packaging is required, due to the acute oral LD50.

Decision: As the products are identical, the subject product may rely on the acute toxicity and product chemistry data for the cited product. Furthermore, although the toxicity criterion for Child Resistant Packaging in 40 CFR 157.22(a) is met, the use criterion in 40 CFR 157.22(b) has not been met. The product cannot be reasonably interpreted to permit residential use. The label states that the product is intended for commercial use. Therefore, based on the use patterns for the product, Child Resistant Packaging will not be required.

Chao, Julie

From: KT Woodall <ktwoodall@wagnerreg.com>
Sent: Wednesday, February 11, 2015 9:11 AM
To: Chao, Julie
Cc: Cheryl Wagner
Subject: RE: 89442-EG and 89442-EU: Label Comments
Attachments: 89442.xxxxx.20141124.V2 - Clean.pdf; 89442.xxxxx.20141124.V2 - Highlighted.pdf;
89442.xxxxx.20141126.V2 - Clean.pdf; 89442.xxxxx.20141126.V2 - Highlighted.pdf

Morning Julie – Please see the attached 2 labels (clean and highlighted). Let me know if you need anything else.

Thanks for all your help!

Kt Woodall

Wagner Regulatory Associates, Inc.

7217 Lancaster Pike, Suite A
Hockessin, DE 19707
302.635.7281 | Fax: 302.635.7295
KtWoodall@wagnerreg.com

From: Chao, Julie [<mailto:Chao.Julie@epa.gov>]
Sent: Tuesday, February 10, 2015 1:35 PM
To: Cheryl Wagner
Subject: 89442-EG and 89442-EU: Label Comments

Hi Cheryl,

Please see the attached label comments for two pending applications: 89442-EG (Bifen 7.9SC Select) and 89442-EU (Bifen G/N 7.9 SC Select). Let me know if you have any questions. Otherwise, you may email the revised labels directly to me.

Thanks,
Julie

+++++

Julie Chao, MA, MSPH
Invertebrate & Vertebrate Branch 1
Registration Division
Office of Pesticide Programs
703.308-8735 (phone)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEE

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

DP BARCODE No.: D425138; **FILE SYMBOL No.:** 89442-EG; **PRODUCT NAME:** Bifen 7.9 SC Select;
DECISION No.: 497710; **PC Code(s):** 128825; **ACTION CODE:** R300; **FOOD Use:** No

DATE OUT: January 27, 2015

SUBJECT: Product Chemistry Review for end use product
Product Name: Bifen 7.9SC Select

FROM: Shyam Mathur,
Product Chemistry Team Leader
CITAB/RD (7505P)

S Mathur
01-27-15
JCR

TO: Julie Chao / Kable Davis, RM 03
IV 1 Branch / RD (7505P)

Company Name: Prime Source LLC
Formulation Type: Insecticide

INTRODUCTION:

The registrant has submitted an application for the registration of the new end use product "Bifen 7.9 SC Select". The registrant has submitted a CSF for basic formulation and two CSF's alternate formulations # 1 to #2 (all dated November 24, 2014). The registrant has claimed that the proposed product is identical in chemical composition to the registered product with Reg. No. 53883-117 and therefore has cited the product chemistry data with MRID No. 46116201 to support the registration of the proposed product. The registrant has also requested waivers for few of the group B product chemistry data. CITAB has been asked to determine the acceptability of the proposed basic & alternate CSF's and the cited product chemistry data. As well as determine similarity to the cited product.

SUMMARY OF FINDINGS:

1. Name of Active Ingredient(s): Bifenthrin (7.9%)
2. Has the registrant claimed substantial similarity to a registered product?
[X] Yes; [] No; [] NA; if yes, give the registration number of the cited product.
EPA Reg. No: 53883-117
3. All of the source materials of the active ingredient are derived from registered sources- [X] Yes; [] No
4. All inert ingredients have been screened by IIAB and found to be approved for the proposed labeled uses.
[X] Yes; [] No

5. Confidential Statement of Formula(s):

☒ Proposed Basic - Dated: 11-24-2014; Re-submitted - Dated:

☒ Proposed Alternate CSF's #1 to #2 - All Dated: 11-24-2014; Re-submitted - Dated:

Alternate CSF(s) complies with 40CFR§152.43: ☒ Yes; ☐ No; ☐ NA

6. Product label

a. Ingredient statement: Nominal concentration of AI listed on CSF(s) concurs with product label (PR Notice 91-2).

☒ Yes, if not, explain below:

Is the sub statement in compliance with PR Notice 97-6 (inert ingredient vs other ingredient)

☒ Yes; ☐ No; if not, explain below:

Metallic equivalent: ☐ Yes ☒ NA;

Soluble arsenic: ☐ Yes ☒ NA

Isomeric ratios: ☒ Yes ☐ NA; Cis isomers 97% minimum, trans isomers 3% maximum

Acid Equivalent: ☐ Yes ☒ NA; acid equivalent =

b. Health related sub statements: Product contains?

Petroleum distillate at > 10%: ☐ Yes ☒ No ☐ NA

Methanol at > 4%: ☐ Yes ☒ No ☐ NA

Sodium nitrate/Sodium nitrite ☐ Yes ☒ No ☐ NA

c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?

☐ Yes ☒ No

Is the sub statement in compliance with PR Notice 98-6 (Total Release Fogger)?

☐ Yes; ☐ No; ☒ NA; if not, explain below

d. Label requires an additional Storage and Disposal statement: ☐ Yes ☒ No; if yes explain below:

7. Group A: Cited from Reg. No. 53883-117

TRB's determination of the acceptability for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		TRB's Assessment of Data	MRID Nos.
			Yes	No		
830.1550	Product Identity & Composition		cited		A	46116201
830.1600	Description of materials used to produce the product		cited		A	46116201
830.1650	Description of formulation process		cited		A	46116201
830.1670	Discussion on the formation of impurities		cited		A	46116201
830.1700	Preliminary analysis		NA			
830.1750	Certified limits (158.350)	Standard certified limits	X		A	Basic CSF dated 11-24-2014
		Proposed limits				
		Justifications for wider limits				
830.1800	Enforcement analytical method		cited		A	4616201 (validation provided along with accelerated storage stability study; JRF Study No. 3220)

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver Request, I = In Progress, NA = Not Applicable; U = Upgradeable.

8. Group B: Cited from Reg. No. 53883-117

Guideline No.	Study Title	Value or Qualitative Description	TRB's Assessment of Data	MRID Nos. Cited
830.6303	Physical State	Liquid @21.8°C	cited	46116201
830.6315	Flammability	Does not contain combustible liquid	cited	Data matrix dated 11-24-2014
830.6316	Explodability	Does not contain explosive properties	cited	" " "
830.7000	pH	5.8-6.2@21.8°C	cited	46116201
830.7300	Density	8.65 lbs/gal @21.6°C	cited	46116201
830.7100	Viscosity	600-700 cPs @20°C	cited	46116201
830.6314	Oxidation/reduction	Not oxidizing or reducing agent	cited	Data matrix dated 11-24-2014
830.6317	Storage stability	Chemically stable for one year under warehouse conditions in commercial HDPE containers	cited	46116201
830.6320	Corrosion characteristics	No corrosion, leakage, or color was seen on the containers during one year storage in commercial containers	cited	46116201

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver request, NA = Not applicable, I = In progress; U = Upgradeable.

CONCLUSIONS:

The CITAB has reviewed the product chemistry data cited to support the registration of the proposed end-use product and has concluded that:

1. The proposed revised basic CSF (dated 11-24-2014) is acceptable.
2. The proposed alternate CSF's #1 to #2 (all dated 11-24-2014) are acceptable.
3. The product chemistry data cited corresponding to guidelines 830.1550 (product identity & composition), 830.1600 (description of materials used to produce the product), 830.1650 (description of the formulation process), 830.1670 (discussion on the formation of impurity), 830.1750 (certified limits), and 830.1800 (enforcement analytical method) are acceptable.
4. The product chemistry data cited corresponding to guideline 830 series group B (physical chemical properties) are acceptable, including the cited data for the guidelines 830.6317 (storage stability) and 830.6320 (corrosion characteristics).
5. The proposed product with File Symbol No. 89442-EG was determined to be identical in chemical composition to the cited product with Reg. No. 53883-117 and therefore, the cited product chemistry will also support the registration application for the proposed end use product.

DATA PACKAGE BEAN SHEET

Date: 21-Jan-2015

Page 1 of 2

Decision #: 497710

DP #: (425138)

PRIA

Parent DP #:

Submission #: 961015

E-Sub #:

FEE

*** Registration Information ***

Registration: 89442-EG - BIFEN 7.9SC SELECT

Company: 89442 - PRIME SOURCE, LLC

Risk Manager: RM 03 - Kable Davis - (703) 306-0415 Room# PY1 S-7723

Risk Manager Reviewer: Julie Chao JCHAO

Sent Date:

PRIA Due Date: 17-Apr-2015

Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (R300) NEW PRODUCT;OR SIMILAR COMBINATION PRODUCT (ALREADY REGISTERED)

Ingredients: 128825, Bifenthrin(7.9%)

R300
#134231

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 21-Jan-2015

Due Back:

DP Ingredient: 128825, Bifenthrin

DP Title: Product Chemistry

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #:

Assigned To

Date In

Date Out

Organization: RD / CITAB

Last Possible Science Due Date: 16-Feb-2015

Team Name: CHEM

Science Due Date:

Reviewer Name:

Shyam Mary

01-26-15

01-27-15

Sub Data Package Due Date:

Contractor Name:

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

Can be printed on its own page

*** Data Package Instructions ***

45-day screen due date: February 2, 2015

Please review MRID 46116201, which is being cited to fulfill the product chemistry requirements for 89442-EG, a proposed new product containing bifenthrin. The applicant has requested waivers for certain Group B requirements (guidelines 830.6314, .6315, .6316, .6319, .6321). A copy of the submission cover letter, letter of authorization, data matrix, proposed label, and proposed CSFs (Basic, Alternate 1, Alternate 2) are enclosed. Please let me know if you need any additional information. Thank you.

53883-117

check
MRID NO.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

SIMILARITY CLINIC MEMORANDUM:

Subject: EPA Reg. No.: 89442-EG/Bifen 7.9SC Select
DP Barcode: 424459
PC Code: 128825

From: Marianne Lewis, Biologist
Insecticides/Rodenticides Branch
Registration Division (7505P)

To: Kable Davis, PM 3
IVB1
Registration Division (7505P)

Applicant: Prime Source, LLC
c/o Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707

Marianne Lewis
JCR 12/12/14

FORMULATION FROM EPA Reg. No. 89442-EG LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
Bifenthrin:	7.9%
<u>Inert Ingredient(s):</u>	92.1%
Total	100.0%

BACKGROUND: The registrant is claiming substantial-similarity to EPA Reg. No. 53883-117 and is citing specific MRID's to support the registration of their new product, EPA Reg. No. 89442-EG. The MRID's are as follows: 414136-02 (81-1), 414136-03 (81-2), 414136-04 (81-3), 414136-05 (81-4), 414136-06 (81-5), and 414136-07 (81-6).

After comparing the CSF's, the subject product is not substantially similar to EPA Reg. No. 53883-117. However, after comparing the CSF's from the subject product and the test material used in the cited studies, it has been determined that the cited studies may be used to support the registration of the subject product.

Therefore, the following acute toxicity categories will be assigned to the subject product: acute oral (81-1) – III; acute dermal (81-2) – III; acute inhalation (81-3) – III; primary eye irritation (81-4) – IV; primary skin irritation (81-5) – IV; and will be classified as a non sensitizer (81-6).

RECOMMENDATIONS:

- The subject product will be assigned the Toxicity Categories listed above.
- The subject product will be classified as a non sensitizer.
- • The acute oral LD₅₀ = 632 mg/kg. Since this not a Restricted Use Product it has to be in Child Resistant Packaging.

The acute toxicity profile for EPA Reg. No. 89442-EG is currently:

Acute Oral	III	LD ₅₀ = 632 mg/kg
Acute Dermal	III	
Acute Inhalation	III	
Primary Eye	IV	
Primary Dermal	IV	
Skin sensitization	non sensitizer	

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING:

ID #: 089442-EG BIFEN 7.9SC SELECT

CHILD RESISTANT PACKAGING REQUIRED:

Due to acute oral LD₅₀ = 632 mg/kg

SIGNAL WORD: **CAUTION**

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Harmful if swallowed. Harmful if absorbed through skin. Harmful if inhaled. Avoid contact with eyes, skin, or clothing. Avoid breathing spray mist or vapor. Wear long sleeved shirt, long pants, shoes, socks and chemical resistant gloves (such as or made out of any waterproof material, selection category A).

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

21-Day Screen Completed by
Contractor

21-Day Expires on 12-17-14

Jacket # 89442-EG
MRID# _____

Content Screen: Recommend to ☒ **Pass** / Fail

11-3 Review: Pass/Fail ☒ **NA**

Overall Status: Recommend to ☒ **Pass** / Fail

Transfer This Jacket to:

STEPHEN SCHAIKLE

PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 11-26-14

Experts In-Processing Signature: B.B.

Date 12-2-14 Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: <u>89442-EC</u>		EPA Receipt Date: <u>11-26-14</u>				
Items for Review			Yes	No	N/A*	
1	Application Form (EPA Form 8570-1) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)			X		
	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
		X				
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	yes	no			
	b) Cite-All (Fee category experts use)	X				
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of Label (Electronic labels on CD are encouraged and guidance is available)			X		
7	Is the data package consistent with PR Notice 86-5					X
8	Notice of Filing included with petitions					X

9	If applicable for conventional applications, <u>reduced risk rationale</u>			X
10	<u>Required Data</u> and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			

Comments:

- * All forms submitted
- * No studies submitted w/ application
- * Inerts approved for NON-FOOD use
- * Jacket Passed

JS 12/14

MRID: None

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the inert Web site and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch.

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

December 1, 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-497710
EPA File Symbol or Registration Number: 89442-EG
Product Name: BIFEN 7.9SC SELECT
EPA Receipt Date: 26-Nov-2014
EPA Company Number: 89442
Company Name: PRIME SOURCE, LLC

CHERYL WAGNER
WAGNER REGULATORY ASSOCIATES, INC
PRIME SOURCE, LLC
PO Box 640
HOCKESSIN, DE 19707-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R300
NEW PRODUCT;OR SIMILAR COMBINATION PRODUCT (ALREADY REGISTERED) TO AN IDENTICAL OR SUBSTANTIALLY SIMILAR IN COMPOSITION AND USE TO A REGISTERED PRODUCT;REGISTERED SOURCE OF ACTIVE INGREDIENT;NO DATA REVIEW ON ACUTE TOXICITY, EFFICACY OR CRP - ONLY PRODUCT CHEMISTRY DATA;CITE-ALL DATA CITATION, OR SELECTIVE DATA CITATION WHERE APPLICANT OWNS ALL REQUIRED DATA, OR APPLICANT SUBMITS SPECIFIC AUTHORIZATION LETTER FROM DATA OWNER;CATEGORY ALSO INCLUDES 100% RE-PACKAGE OF REGISTERED END-USE OR MANUFACTURING-USE PRODUCT THAT REQUIRES NO DATA SUBMISSION NOR DATA MATRIX;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,

A handwritten signature in cursive script that reads "Teresa Downs".

Front End Processing Staff

Information Technology & Resources Management Division

Fee for Service

W
{961015v~

This package includes the following

☒ New Registration

☐ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: _____

for Division

☐ AD

☐ BPPD

☒ RD

Risk Mgr.

3

Receipt No.

S-

961015

EPA File Symbol/Reg. No.

89442-EG

Pin-Punch Date:

11/26/2014

☐ This item is NOT subject to FFS action.

Action Code:

Requested:

R300

Granted:

R300

Amount Due: \$

1506⁰⁰

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer:

Kimmy

Date:

12/1/14

Remarks:

Has LogA

Sim Clinic Needed



Receipt for Section 3

S: 961015

Milestone Email:

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: New Registration

Fee For Service: ☒ Yes ☐ No

Billable: ☒ Yes ☐ No

Company: 89442 PRIME SOURCE, LLC

V

Print Letter

Enter More Information

Tracking

Risk Manager: Registration Division, Risk Management Team 3

Product #: 89442-EG Product Name: BIFEN 7.9SC SELECT

Override#:

Me Too
Section3: 53883-117

Me Too Product
Name: BIFENTHRIN LT

Application Date: 24-Nov-2014

OPP Rec'd Date: 26-Nov-2014

Front End Date: 26-Nov-2014

Risk Manager Send Date:

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

NEW REGISTRATION

Receipt Content

CSF

Paper Label

View/Edit

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Cheryl Wagner

From: pay.gov.clev@clev.frb.org
Sent: Tuesday, November 25, 2014 4:11 PM
To: Cheryl Wagner
Subject: Pay.gov Payment Confirmation: PRIA Service Fees

Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact Michael Yanchulis at (703) 347-0237 or by email at yanchulis.michael@epa.gov.

Application Name: PRIA Service Fees
Pay.gov Tracking ID: 25IJTCGV
Agency Tracking ID: 74713132066
Transaction Type: Sale
Transaction Date: 11/25/2014 04:11:28 PM EST

Account Holder Name: Cheryl R. Wagner

Transaction Amount: \$1,506.00
Billing Address: 7217 Lancaster Pike
Billing Address 2: Suite A
City: Hockessin
State/Province: DE
Zip/Postal Code: 19707
Country: USA
Card Type: AmericanExpress
Card Number: *****2008

Registration Number:
Company Name: Prime Source LLC
Company Number: 89442
Action Code: R300

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.





Receipt

Your payment is complete

Pay.gov Tracking ID: 25IJTCGV

Agency Tracking ID: 74713132066

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

Payment Information

Payment Type: Debit or credit card

Payment Amount: \$1506.00

Transaction Date: 11/25/2014 04:11:28 PM EST

Payment Date: 11/25/2014

Registration Number:

Company Name: Prime Source LLC

Company Number: 89442

Action Code: R300

Account Information

Card Holder Name: Cheryl R. Wagner

Billing Address: 7217 Lancaster Pike

Billing Address 2: Suite A

City: Hockessin

Country: United States

State/Province: DE

ZIP/Postal Code: 19707

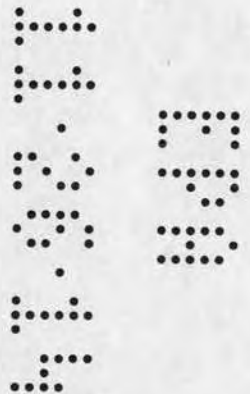
Card Type: American Express

Card Number: *****2008

Email Confirmation Receipt

Confirmation Receipts have been emailed to:

cheryl@wagnerreg.com





United States
Environmental Protection Agency
 Washington, DC 20460

X

Registration

OPP Identifier Number

Amendment

Other

Application for Pesticide - Section I

1. Company/Product Number 89442-	2. EPA Product Manager Mindy Ondish	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Prime Source LLC/Bifen 7.9SC Select	PM# 25	
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. 53883-117 Product Name: Bifenthrin LT

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input checked="" type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) HDPE lined bags	
* Certification must be submitted					
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2.5, 5 gallons		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other ___ adhesive backed label _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Cheryl Wagner		Title Agent for Prime Source, LLC		Telephone No. (Include Area Code) (302) 635-7289 Cheryl@wagnerreg.com	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Agent for Prime Source, LLC.			
4. Typed Name Cheryl Wagner		5. Date November 24, 2014			

This is a reproduction of EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

FEDERAL EXPRESS

November 24, 2014

Document Processing Desk (REGFEE)
ATTN: Mindy Ondish (PM 25)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



WRA

Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

**Re: Application to register a new product that is a "me-too" of a currently registered product -
"Bifen 7.9SC Select"**

Dear Ms. Ondish:

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, is requesting registration of the above referenced product. This product is identical in labeling and composition to the product Bifenthrin LT EPA Registration Number 53883-117. Control Solutions, Inc. has provided Prime Source, LLC authorization to cite data used to support to the registration of Bifenthrin LT. In support of this request, enclosed are the following documents:

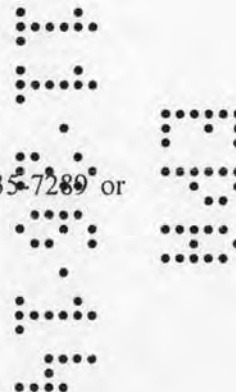
- Letter from Prime Source LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Letter of authorization from Control Solutions, Inc.
- Application for Pesticide Registration (8570-1)
- Confidential Statement of Formula (8570-4), 2 copies
- Formulator's Exemption Statement (8570-27)
- Data Matrix, EPA internal and public copies (8570-35)
- Draft labeling, 2 copies and CD
- Statement with Respect to Label Integrity
- A copy of the EPA approved label for EPA Reg. No. 53883-117
- A copy of the receipt confirming payment of the required registration fees

If you have any questions about this submission please contact the undersigned at (302) 635-7289 or cheryl@wagnerreg.com.

Respectfully submitted,

Cheryl Wagner
Agent for Prime Source LLC

Enclosures



CSI
CONTROL
SOLUTIONS
incorporated

November 20, 2014

Bo Davis (PM 3)
Document Processing Desk
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Subject: Letter of Authorization for Prime Source, LLC
Permission to Cite Data

Dear Mr. Davis:

Please let this letter serve to notify the U.S. Environmental Protection Agency that Control Solutions, Inc. (EPA Co. No. 53883) allows Prime Source, LLC (EPA Co. No. 89442) to cite product chemistry data in support of an application for registration of their Bifenthrin 7.9% end use product.

This data is proprietary to Control Solutions, Inc., and this letter does not confer ownership or exclusive rights of the data. In addition, the authorization is solely for the citation of data and does not authorize the release of these studies to Prime Source, LLC or any other party. Below is a list of the studies that Prime Source, LLC is authorized to cite:

MRID Number
46116201

Please feel free to contact me should you have any questions.

Sincerely,

Lisa Adamson

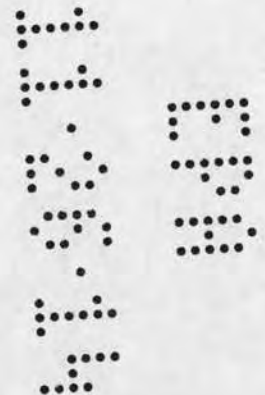


ADAMA

Consumer &
Professional
Solutions

Lisa Adamson

Regulatory Group Leader | Regulatory Affairs
D +1-281-892-2522
E ladamson@controlsolutionsinc.com





United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Prime Source LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707	EPA File Symbol/Registration Number 89442-
	Product Name Bifen 7.9SC Select
	Date of Confidential Statement of Formula (EPA Form 8570-4) 11/24/2014

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Bifenthrin

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Bifenthrin	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
Signature 	Name and Title Cheryl Wagner, Agent	Date 11/24/2014

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA
Copy 2 - Applicant copy



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number
 Prime Source, LLC, P.O. Box 640, Hockessin, DE 19707

EPA Registration Number/File Symbol
 89442-

Active Ingredient(s) and/or representative test compound(s)
 Bifenthrin

Date
 November 24, 2014

General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158)
 Terrestrial Non-Food Crops

Product Name
 Bifen 7.9SC Select

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Date

Typed or Printed Name and Title

Nov. 24, 2014

Cheryl Wagner, Agent for Prime Source LLC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington DC 20460. Do not send the form to this address.

DATA MATRIX

Date: November 24, 2014	EPA Reg No./ File Symbol: 89442-	Page 1 of 3
Applicant's/Registrant's Name and Address: Prime Source LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Bifen 7.9SC Select	
Ingredient: Bifenthrin		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC					
830.1550, 830.1600, 830.1620, 830.1650, 830.1670,	Product Identity, Composition/Description of Materials used to Produce the Product/Description of Formulation Process/Discussion of Formation of Impurities	46116201	Control Solutions, Inc.	PER	
830.1700	Preliminary Analysis	46116201	Control Solutions, Inc.	PER	
830.1750	Certification of Limits		Prime Source LLC	OWN	1
830.1800	Enforcement Analytical Method	46116201	Control Solutions, Inc.	PER	
830.6302	Color	46116201	Control Solutions, Inc.	PER	
830.6303	Physical State	46116201	Control Solutions, Inc.	PER	
830.6304	Odor	46116201	Control Solutions, Inc.	PER	
830.6314	Oxidation/Reduction		Prime Source, LLC	WAI	
830.6315	Flammability		Prime Source, LLC	WAI	
830.6316	Explosibility		Prime Source, LLC	WAI	
830.6317	Storage Stability	46116201	Control Solutions, Inc.	PER	
830.6319	Miscibility		Prime Source, LLC	WAI	
830.6320	Corrosion Characteristics	46116201	Control Solutions, Inc.	PER	
830.6321	Dielectric Breakdown		Prime Source, LLC	WAI	
830.7000	pH	46116201	Control Solutions, Inc.	PER	
830.7100	Viscosity	46116201	Control Solutions, Inc.	PER	
830.7220	Boiling Point	46116201	Control Solutions, Inc.	PER	
830.7300	Density/Relative Density	46116201	Control Solutions, Inc.	PER	
870.1100	Acute Oral Toxicity	41413602	FMC Corp.	OLD	
870.1200	Acute Dermal Toxicity	41413603	FMC Corp.	OLD	

Signature: Cheryl Wagner	Name and Title: Cheryl Wagner, Agent for Prime Source LLC	Date: November 24, 2014
--------------------------	---	-------------------------



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

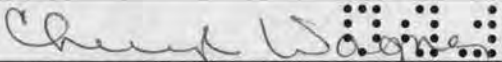
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington DC 20460. Do not send the form to this address.

DATA MATRIX

Date: November 24, 2014	EPA Reg No./ File Symbol: 89442-	Page 2 of 3
Applicant's/Registrant's Name and Address: Prime Source LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Bifen 7.9SC Select	
Ingredient: Bifenthrin		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1300	Acute Inhalation Toxicity	41413604	FMC Corp.	OLD	
870.2400	Primary Eye Irritation	41413605	FMC Corp.	OLD	
870.2500	Primary Dermal Irritation	41413606	FMC Corp.	OLD	
870.2600 810.3600	Dermal Sensitization Product Performance, Structural Treatments	Cite All	Nufarm Americas, Inc., Morrisville, NC	PAY	
			The Scotts Company, Marysville, OH	PAY	
			FMC Corp., Philadelphia, PA	PAY	
			Bayer Environmental Science, Research Triangle Park, NC	PAY	
			BASF Corporation, Research Triangle Park, NC	PAY	
			Lebanon Seaboard Corp., Lebanon, PA	PAY	
			McLaughlin Gormley King Company, Minneapolis, MN	PAY	
			Winfield Solutions, Inc., St. Paul, MN	PAY	
			Sergeant's Pet Care Products, Omaha, NE	PAY	
			Aceto Agricultural Chemicals Corp., Fort Washington, NY	PAY	
			S. C. Johnson & Son, Inc., Racine, WI	PAY	
			Amvac Chemical Corp., Newport Beach, CA	PAY	
			Nippon Soda Co. Ltd., New York, NY	PAY	
			Atex, Inc., Valdosta, GA	PAY	
			Osmose Utilities Services, Inc., Tyrone, GA	PAY	
			Chemsico, St. Louis, MO	PAY	
			Lesco, Inc., Cleveland, OH	PAY	
			Makhteshim Chemical Works, Ltd., Raleigh, NC	PAY	
			Loveland Products, Greeley, CO	PAY	
			Ensystex II, Inc., Gig Harbor, WA	PAY	
			Albaugh, Inc., Valdosta, GA	PAY	

Signature 	Name and Title Cheryl Wagner, Agent for Prime Source LLC	Date November 24, 2014
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington DC 20460. Do not send the form to this address.

DATA MATRIX

Date: November 24, 2014	EPA Reg No./ File Symbol: 89442-	Page 3 of 3
Applicant's/Registrant's Name and Address: Prime Source LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Bifen 7.9SC Select	
Ingredient: Bifenthrin		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Tacoma Ag LLC, Brookfield, CT	PAY	
			Bifenthrin Task Force Steering Committee, Washington, DC	PAY	
			Vive Crop Protection, Inc., East Lansing, MI	PAY	
			Valent USA Corp., Walnut Creek, CA	PAY	
			Pyrethroid Working Group, Washington, DC	PAY	
			MakhteshimAgan of North America, Inc., Raleigh, NC	PAY	
			Arysta Lifescience North America, LLC, Cary, NC	PAY	
			Liberty Crop Protection LLC, Loveland, CO	PAY	
			Bengal Products, Inc., Baton Rouge, LA	PAY	
			United Phosphorus, Inc., King of Prussia, PA	PAY	

Footnotes:

- 1) Certification of Limits is provided in the Confidential Statement of Formula EPA form 8574-4
- 2) 830.6314: Oxidation/Reduction: Bifen 7.9SC Select does not contain oxidizing agents; therefore, a waiver is requested.
- 3) 830.6315: Flammability: Bifen 7.9SC does not contain combustible liquids; therefore, a waiver is requested.
- 4) 830.6316: Explodability: Bifen 7.9SC does not contain explosive properties; therefore, a waiver is requested.
- 5) 830.6319: Miscibility: Bifen 7.9SC is not an emulsifiable liquid and is not diluted with petroleum solvents; therefore, a waiver is requested.
- 6) 830.6320: Corrosion Characteristics:
- 7) 830.6321: Dielectric Breakdown Voltage: Bifen 7.9SC is not used around electrical equipment; therefore, a waiver is requested.

47.93.11

H.3.3

Signature <i>Cheryl Wagner</i>	Name and Title Cheryl Wagner, Agent for Prime Source LLC	Date November 24, 2014
-----------------------------------	---	---------------------------

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
89442	November 24, 2014	89442-xxxxxx.20141124.V1.pdf

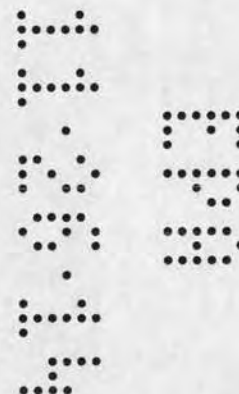
I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Cheryl Wagner
Signature

11/24/2014
Date

Cheryl Wagner
Name (typed)

Agent for Prime Source, LLC
Title



Prime Source, LLC. 4609 E. Boonville-New Harmony Road, Evansville, IN 47725

U.S. Environmental Protection Agency
Office of Pesticide Programs (7505P)
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

State Pesticide Product Regulatory Agencies in the United States

Re: Designation of Agent for: Prime Source, LLC,

Dear Sir or Madam:

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to products that Prime Source, LLC will register with US EPA and state regulatory authorities. Prime Source, LLC hereby authorizes EPA and state regulatory authorities to contact any of the following individuals within WRA, Inc.:

EPA Contacts (Any of the following individuals may be contacted by EPA on our behalf)

James M. Wagner
Managing Director
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7290
Fax: (302) 635-7295
Email: james@wagnerreg.com

Cheryl R. Wagner
President
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Lori Kohler
Regulatory Associate
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7281
Fax: (302) 635-7295
Email: lori@wagnerreg.com

State Contacts (Any of the following individuals may be contacted by state regulatory authorities on our behalf)

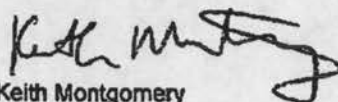
Barbarette Young-Henry
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7279
Fax: (302) 635-7295
Email: Barbarette@wagnerreg.com

Cheryl Wagner
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

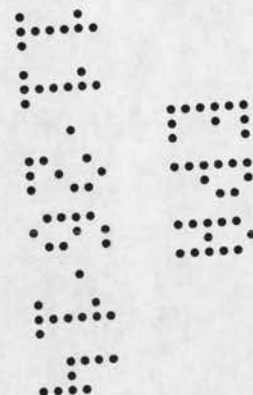


Authorization to contact these staff members within WRA, Inc remains in effect until such time that Prime Source, LLC provides notification in writing of any changes.

Respectfully submitted,



Keith Montgomery
Sales Manager



September 10th, 2015



WRA

Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

Document Processing Desk
ATTN: Richard Gebken (PM 10)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

PM 3

Re: Bifen 7.9SC Select ABN: Bifen 7.9F Select, EPA Registration No. 89442-23 - Final Print

Dear Mr. Gebken:

Wagner Regulatory Associates, Inc. respectfully submits the enclosed final print label for the subject product as requested in the EPA letter dated August 19th, 2015.

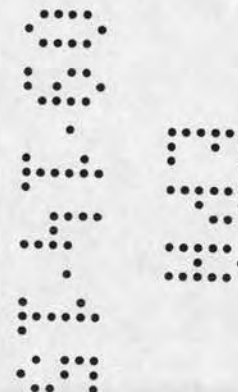
If you have any questions about this submission please contact the undersigned at (302) 635-7289 or cheryl@wagnerreg.com.

Respectfully submitted,

Cheryl R. Wagner

Cheryl Wagner
Agent for Prime Source LLC

Enclosure



Prime Source, LLC. 4609 E. Boonville-New Harmony Road, Evansville, IN 47725

U.S. Environmental Protection Agency
Office of Pesticide Programs (7505P)
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

State Pesticide Product Regulatory Agencies in the United States

Re: Designation of Agent for: Prime Source, LLC.

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James M. Wagner
Managing Director
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7290
Fax: (302) 635-7295
Email: james@wagnerreg.com

Cheryl R. Wagner
President
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Lori Kohler
Regulatory Associate
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7281
Fax: (302) 635-7295
Email: lori@wagnerreg.com

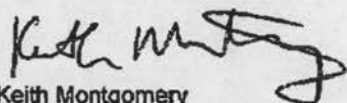
State Contacts (Any of the following individuals may be contacted by state regulatory authorities on our behalf)

Barbarette Young-Henry
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7279
Fax: (302) 635-7295
Email: Barbarette@wagnerreg.com

Cheryl Wagner
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Authorization to contact these staff members within WRA, Inc remains in effect until such time that Prime Source, LLC provides notification in writing of any changes.

Respectfully submitted,



Keith Montgomery
Sales Manager

55



United States
Environmental Protection Agency
 Washington, DC 20460

Registration

OPP Identifier Number

Amendment

Other

Application for Pesticide - Section I

1. Company/Product Number 89442-23	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Prime Source LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select	PM# 25	
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated <u>August 19th, 2015</u>
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
	If "Yes" No. per Unit Packaging wgt. container	If "Yes" No. per Package wgt. container		<input type="checkbox"/> Plastic	
* Certification must be submitted				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) HDPE lined bags	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2.5, 5 gallons		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____ adhesive backed label _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Cheryl Wagner		Title Agent for Prime Source, LLC		Telephone No. (Include Area Code) (302) 635-7289 Cheryl@wagnerreg.com	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received
2. Signature 		3. Title Agent for Prime Source, LLC.			
4. Typed Name Cheryl Wagner		5. Date September 10 th , 2015			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 19, 2015

Cheryl Wagner
Prime Source, LLC
c/o Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707

Subject: Label Amendment—Additional Directions for Use and Pests
Product Name: BIFEN 7.9SC SELECT
EPA Registration Number: 89442-23
Application Date: May 12, 2015
Decision Number: 505098

Dear Mrs. Wagner:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

Page 2 of 2
EPA Reg. No. 89442-23
Decision No. 505098

with FIFRA section 6. If you have any questions, please contact Maggie Rudick by phone at 703-347-0257, or via email at rudick.maggie@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to be 'Kable Bo Davis', enclosed within a large, hand-drawn oval.

Kable Bo Davis, Product Manager 3
Invertebrate and Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

Rudick, Maggie

From: Cheryl Wagner <cheryl@wagnerreg.com>
Sent: Tuesday, August 11, 2015 4:58 PM
To: Rudick, Maggie
Subject: RE: Label Revisions - EPA reg # 89442-23
Attachments: 89442-00023.20150512.V2.clean.pdf; 89442-00023.20150512.V2.highlighted.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Maggie,

This product is intended to be used by commercial applicators only in residential areas—it is not sold to homeowners.

Attached are clean and highlighted versions of the revised label.

Regards,

Cheryl Wagner

Wagner Regulatory Associates, Inc.

Telephone: (302) 635-7289

Fax: (302) 635-7295

From: Rudick, Maggie [mailto:Rudick.Maggie@epa.gov]
Sent: Tuesday, August 11, 2015 3:42 PM
To: Cheryl Wagner
Cc: IVB1
Subject: Label Revisions - EPA reg # 89442-23

Cheryl –

We have reviewed your 5/12/15 submitted label amendment for EPA Reg # 89442-23 and are requesting some revisions to your proposed label. They are highlighted in the attached draft label. To summarize the revisions:

1. Please clarify intended user. If this product is intended to be used by or sold to homeowners, we will need a certification that this product is being sold in a child resistant package.
2. Precautionary language should remain as it was on your original label since product specific data drives this language.
3. Revisions to Environmental hazards:
 - a. Add Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage plant authority. For guidance contact your State Water Board or Regional Office of the EPA.
 - b. Change "visiting" the treatment area to "foraging" ...
4. Remove "General" in General Use Restrictions, General surface spray, General application instructions, etc.
5. Remove distributors restriction.
6. Remove any reference to greenhouses or nurseries

7. Revise advisory statements that need to be made enforceable such as "Bife.....may not be used in voids insulated with rigid foam insulation."
8. When instructing the user to use a higher rate, clarify the intention to use a higher listed rate/volume/spray/application
9. Add header to table on page 18.

Please let me know if you have any further questions. Once these revisions are made, you can email a revised label back to me.

Thank you,

Maggie Rudick
U. S. Environmental Protection Agency
Office of Pesticides Program
Registration Division; Invertebrate & Vertebrate Branch I
(703) 347-0257
Rudick.Maggie@epa.gov

FEDERAL EXPRESS

May 12, 2015

Document Processing Desk (AMEND)
ATTN: Kable Bo Davis (PM 3)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



WRA

Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

Re: Bifen 7.9SC Select, ABN Bifen 7.9F Select, EPA Reg. No. 89442-23

Dear Mr. Davis:

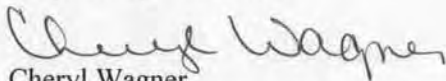
Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, is submitting an amended label for the above referenced product to include directions for use adding termiticide uses, crane flies to the lists of pests on lawns, directions for use on outside surfaces & around buildings, fire ants and hornets to the list of pests, and directions for use on livestock & poultry house structures.

This label has been revised to "me-too" Bifenthrin TC Insecticide/Termiticide, EPA Registration Number 53883-118. In support of this amendment, enclosed are the following documents:

- Letter from Prime Source LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Formulator's Exemption Statement (8570-27)
- Data Matrix, EPA internal and public copies (8570-35)
- Draft labeling, 2 copies (one clean and one highlighted)
- Statement with Respect to Label Integrity
- A copy of the EPA approved label for EPA Reg. No. 66222-192

If you have any questions about this submission please contact the undersigned at (302) 635-7289 or cheryl@wagnerreg.com.

Respectfully submitted,


Cheryl Wagner
Agent for Prime Source LLC

Enclosures



(302) 635-7289



Prime Source, LLC. 4609 E. Boonville-New Harmony Road, Evansville, IN 47725

U.S. Environmental Protection Agency
Office of Pesticide Programs (7505P)
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

State Pesticide Product Regulatory Agencies in the United States

Re: Designation of Agent for: Prime Source, LLC,

Dear Sir or Madam:

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to products that Prime Source, LLC will register with US EPA and state regulatory authorities. Prime Source, LLC hereby authorizes EPA and state regulatory authorities to contact any of the following individuals within WRA, Inc.:

EPA Contacts (Any of the following individuals may be contacted by EPA on our behalf)

James M. Wagner
Managing Director
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7290
Fax: (302) 635-7295
Email: james@wagnerreg.com

Cheryl R. Wagner
President
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Lori Kohler
Regulatory Associate
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7281
Fax: (302) 635-7295
Email: lori@wagnerreg.com

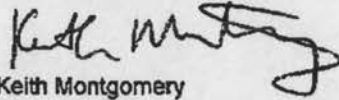
State Contacts (Any of the following individuals may be contacted by state regulatory authorities on our behalf)

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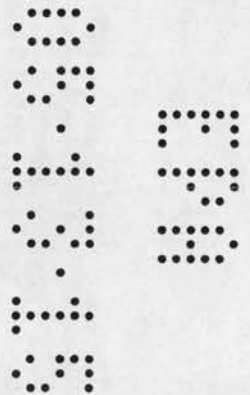
Cheryl Wagner
Wagner Regulatory Associates, Inc.
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Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Authorization to contact these staff members within WRA, Inc remains in effect until such time that Prime Source, LLC provides notification in writing of any changes.

Respectfully submitted,



Keith Montgomery
Sales Manager





United States
Environmental Protection Agency
 Washington, DC 20460

<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Registration
Amendment
Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 89442-23	2. EPA Product Manager Kable Bo Davis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Prime Source LLC/Bifen 7.9SC Select	PM# 3	
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. 53883-118 Product Name: Bifenthrin TC Insecticide/Termiticide

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below. D #505098

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Amendment adding directions for use adding termiticide uses, crane flies to the list of pests, directions for use on outside surfaces & around buildings, fire ants and hornets to the list of pests, and directions for use on livestock & poultry house structures.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt. container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
* Certification must be submitted			
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 1, 2.5, 5 gallons	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other ___ adhesive backed label	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Cheryl Wagner	Title Agent for Prime Source, LLC	Telephone No. (Include Area Code) (302) 635-7289 Cheryl@wagnerreg.com
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamp)
2. Signature 	3. Title Agent for Prime Source, LLC.	
4. Typed Name Cheryl Wagner	5. Date May 12, 2015	

Form approved, OMB No. 2070-0060, 2070-0057, 2070-0107, 2070-0122, 2070-0164.



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Prime Source LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707	EPA File Symbol/Registration Number 89442-23
	Product Name Bifen 7.9SC Select
	Date of Confidential Statement of Formula (EPA Form 8570-4) 04/16/2015

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Bifenthrin

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Bifenthrin	[REDACTED]	[REDACTED]
Signature 	Name and Title Cheryl Wagner, Agent	Date 05/12/2015

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA
Copy 2 - Applicant copy



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington DC 20460. Do not send the form to this address.

DATA MATRIX

Date: May 12, 2015	EPA Reg No./ File Symbol: 89442-23	Page 1 of 3
Applicant's/Registrant's Name and Address: Prime Source LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Bifen 7.9SC Select	
Ingredient: Bifenthrin		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC					
830.1550, 830.1600, 830.1620, 830.1650, 830.1670,	Product Identity, Composition/Description of Materials used to Produce the Product/Description of Formulation Process/Discussion of Formation of Impurities	46116201	Control Solutions, Inc.	PER	
830.1700	Preliminary Analysis	46116201	Control Solutions, Inc.	PER	
830.1750	Certification of Limits		Prime Source LLC	OWN	1
830.1800	Enforcement Analytical Method	46116201	Control Solutions, Inc.	PER	
830.6302	Color	46116201	Control Solutions, Inc.	PER	
830.6303	Physical State	46116201	Control Solutions, Inc.	PER	
830.6304	Odor	46116201	Control Solutions, Inc.	PER	
830.6314	Oxidation/Reduction		Prime Source, LLC	WAI	
830.6315	Flammability		Prime Source, LLC	WAI	
830.6316	Explosibility		Prime Source, LLC	WAI	
830.6317	Storage Stability	46116201	Control Solutions, Inc.	PER	
830.6319	Miscibility		Prime Source, LLC	WAI	
830.6320	Corrosion Characteristics	46116201	Control Solutions, Inc.	PER	
830.6321	Dielectric Breakdown		Prime Source, LLC	WAI	
830.7000	pH	46116201	Control Solutions, Inc.	PER	
830.7100	Viscosity	46116201	Control Solutions, Inc.	PER	
830.7220	Boiling Point	46116201	Control Solutions, Inc.	PER	
830.7300	Density/Relative Density	46116201	Control Solutions, Inc.	PER	
870.1100	Acute Oral Toxicity	41413602	FMC Corp.	OLD	
870.1200	Acute Dermal Toxicity	41413603	FMC Corp.	OLD	

Signature 	Name and Title Cheryl Wagner, Agent for Prime Source LLC	Date May 12, 2015
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date: May 12, 2015	EPA Reg No./ File Symbol: 89442-23	Page 2 of 3
Applicant's/Registrant's Name and Address: Prime Source LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Bifen 7.9SC Select	
Ingredient: Bifenthrin		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1300	Acute Inhalation Toxicity	41413604	FMC Corp.	OLD	
870.2400	Primary Eye Irritation	41413605	FMC Corp.	OLD	
870.2500	Primary Dermal Irritation	41413606	FMC Corp.	OLD	
870.2600	Dermal Sensitization	Cite All	Nufarm Americas, Inc., Morrisville, NC	PAY	
810.3600	Product Performance, Structural Treatments		The Scotts Company, Marysville, OH	PAY	
			FMC Corp., Philadelphia, PA	PAY	
			Bayer Environmental Science, Research Triangle Park, NC	PAY	
			BASF Corporation, Research Triangle Park, NC	PAY	
			Lebanon Seaboard Corp., Lebanon, PA	PAY	
			McLaughlin Gormley King Company, Minneapolis, MN	PAY	
			Winfield Solutions, Inc., St. Paul, MN	PAY	
			Sergant's Pet Care Products, Omaha, NE	PAY	
			Aceto Agricultural Chemicals Corp., Fort Washington, NY	PAY	
			S. C. Johnson & Son, Inc., Racine, WI	PAY	
			Amvac Chemical Corp., Newport Beach, CA	PAY	
			Nippon Soda Co. Ltd., New York, NY	PAY	
			Atex, Inc., Valdosta, GA	PAY	
			Osmose Utilities Services, Inc., Tyrone, GA	PAY	
			Chemsico, St. Louis, MO	PAY	
			Lesco, Inc., Cleveland, OH	PAY	
			Makhteshim Chemical Works, Ltd., Raleigh, NC	PAY	
			Loveland Products, Greeley, CO	PAY	
			Ensystex II, Inc., Gig Harbor, WA	PAY	
			Albaugh, Inc., Valdosta, GA	PAY	

Signature

Name and Title

Cheryl Wagner, Agent for Prime Source LLC

Date

May 12, 2015



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date: May 12, 2015	EPA Reg No./ File Symbol: 89442-23	Page 3 of 3
Applicant's/Registrant's Name and Address: Prime Source LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Bifen 7.9SC Select	
Ingredient: Bifenthrin		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Tacoma Ag LLC, Brookfield, CT	PAY	
			Bifenthrin Task Force Steering Committee, Washington, DC	PAY	
			Vive Crop Protection, Inc., East Lansing, MI	PAY	
			Valent USA Corp., Walnut Creek, CA	PAY	
			Pyrethroid Working Group, Washington, DC	PAY	
			MakhteshimAgan of North America, Inc., Raleigh, NC	PAY	
			Arysta Lifescience North America, LLC, Cary, NC	PAY	
			Liberty Crop Protection LLC, Loveland, CO	PAY	
			Bengal Products, Inc., Baton Rouge, LA	PAY	
			United Phosphorus, Inc., King of Prussia, PA	PAY	

Footnotes:

- 1) Certification of Limits is provided in the Confidential Statement of Formula EPA form 8574-4
- 2) 830.6314: Oxidation/Reduction: Bifen 7.9SC Select does not contain oxidizing agents; therefore, a waiver is requested.
- 3) 830.6315: Flammability: Bifen 7.9SC does not contain combustible liquids; therefore, a waiver is requested.
- 4) 830.6316: Explodability: Bifen 7.9SC does not contain explosive properties; therefore, a waiver is requested.
- 5) 830.6319: Miscibility: Bifen 7.9SC is not an emulsifiable liquid and is not diluted with petroleum solvents; therefore, a waiver is requested.
- 6) 830.6320: Corrosion Characteristics:
- 7) 830.6321: Dielectric Breakdown Voltage: Bifen 7.9SC is not used around electrical equipment; therefore, a waiver is requested.

97.01.90

H43

Signature 	Name and Title Cheryl Wagner, Agent for Prime Source LLC	Date May 12, 2015
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 22, 2015

Cheryl Wagner
Prime Source LLC
c/o Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707

Subject: CSF Notification per PRN 98-10 – Add Additional Production Facilities to Basic, Alternate #1, and Alternate #2 CSF
Product Name: BIFEN 7.9SC SELECT
EPA Registration Number: 89442-23
Application Date: June 10, 2015
Decision Number: 505954

Dear Ms. Wagner:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The CSFs submitted with your application have been stamped "Notification" and placed in our files.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 06/10/2015
- Alternate CSF 1 dated 06/10/2015
- Alternate CSF 2 dated 06/10/2015

Any CSFs other than those listed above are superseded/no longer valid. If you have any questions, you may contact Maggie Rudick at (703) 347-0257 or via email at rudick.maggie@epa.gov.

Sincerely,

Maggie Rudick
for

Kable Bo Davis, Product Manager 3
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

June 10
~~March 16th~~, 2015



Document Processing Desk (NOTIF)
ATTN: Richard Gebken (PM 10)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Re: Bifen 7.9SC Select ABN: Bifen 7.9F Select, EPA Reg. No. 89442-23
Notification of Revised Confidential Statement of Formulas

Dear Mr. Gebken:

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, respectfully notifies the Agency that an additional production facility has been added to Box 2 of the Basic, Alternate 1, and Alternate 2 Confidential Statement of Formulas. These revised CSFs will replace all current EPA approved CSFs dated March 16th, 2015.

In support of this request, the following documents and studies are attached:

- Letter from Prime Source LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- 2 copies of the revised CSF

Please feel free to contact me via email at cheryl@wagnerreg.com or telephone at (302) 635-7289.

Respectfully submitted,

Cheryl Wagner
Agent for Prime Source LLC

Enclosures



United States
Environmental Protection Agency
 Washington, DC 20460

Registration

OPP Identifier Number

Amendment

Other

Application for Pesticide - Section I

1. Company/Product Number 89442-23	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Prime Source LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select	PM# 10	
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Notification to add additional producer to CSFs.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt. container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
--	--	--	---

* **Certification must be submitted**

3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 1, 2.5, 5 gallons	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other ___ adhesive backed label _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Cheryl Wagner	Title Agent for Prime Source, LLC	Telephone No. (Include Area Code) (302) 635-7289 Cheryl@wagnerreg.com
-----------------------	--------------------------------------	--

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature <i>Cheryl R. Wagner</i>	3. Title Agent for Prime Source, LLC.	6. Date Application Received (Stamped)
4. Typed Name Cheryl Wagner	5. Date June 10 th , 2015	

Prime Source, LLC. 4609 E. Boonville-New Harmony Road, Evansville, IN 47725

U.S. Environmental Protection Agency
Office of Pesticide Programs (7505P)
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

State Pesticide Product Regulatory Agencies in the United States

Re: Designation of Agent for: Prime Source, LLC,

Dear Sir or Madam:

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to products that Prime Source, LLC will register with US EPA and state regulatory authorities. Prime Source, LLC hereby authorizes EPA and state regulatory authorities to contact any of the following individuals within WRA, Inc.:

EPA Contacts (Any of the following individuals may be contacted by EPA on our behalf)

James M. Wagner
Managing Director
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7290
Fax: (302) 635-7295
Email: james@wagnerreg.com

Cheryl R. Wagner
President
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Lori Kohler
Regulatory Associate
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7281
Fax: (302) 635-7295
Email: lori@wagnerreg.com

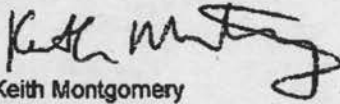
State Contacts (Any of the following individuals may be contacted by state regulatory authorities on our behalf)

Barbarette Young-Henry
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7279
Fax: (302) 635-7295
Email: Barbarette@wagnerreg.com

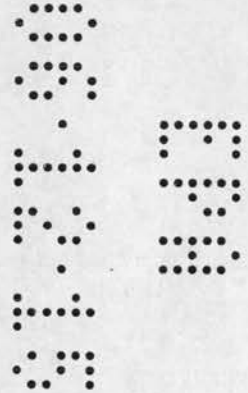
Cheryl Wagner
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Authorization to contact these staff members within WRA, Inc remains in effect until such time that Prime Source, LLC provides notification in writing of any changes.

Respectfully submitted,



Keith Montgomery
Sales Manager





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 30, 2015

Cheryl Wagner
Prime Source LLC
c/o Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707

Subject: Notification per PRN 98-10 – Remove NY State Specific Language on First Page
Product Name: BIFEN 7.9SC SELECT
EPA Registration Number: 89442-23
Application Date: April 9, 2015
Decision Number: 503458

Dear Ms. Wagner:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, you may contact Maggie Rudick at (703) 347-0257 or via email at rudick.maggie@epa.gov.

Sincerely,

Maggie Rudick
for

Kable Bo Davis, Product Manager 3
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

April 9th, 2015



Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

Document Processing Desk (NOTIF)
ATTN: Mindy Ondish (PM 25)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Re: Bifen 7.9SC Select ABN: Bifen 7.9F Select, EPA Registration No. 89442-23 - Notification

Dear Ms. Ondish:

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, is submitting a notification to remove the New York state specific language off the first page. No other changes have been made to the label.

In support of this notification, the following documents are attached:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- A copy of the label

Please feel free to contact me via email at cheryl@wagnerreg.com or telephone at (302) 635-7289

Respectfully submitted,

Cheryl Wagner
Agent for Prime Source LLC

Enclosures



Prime Source, LLC. 4609 E. Boonville-New Harmony Road, Evansville, IN 47725

U.S. Environmental Protection Agency
Office of Pesticide Programs (7505P)
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

State Pesticide Product Regulatory Agencies in the United States

Re: Designation of Agent for: Prime Source, LLC.

Dear Sir or Madam:

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to products that Prime Source, LLC will register with US EPA and state regulatory authorities. Prime Source, LLC hereby authorizes EPA and state regulatory authorities to contact any of the following individuals within WRA, Inc.:

EPA Contacts (Any of the following individuals may be contacted by EPA on our behalf)

James M. Wagner
Managing Director
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7290
Fax: (302) 635-7295
Email: james@wagnerreg.com

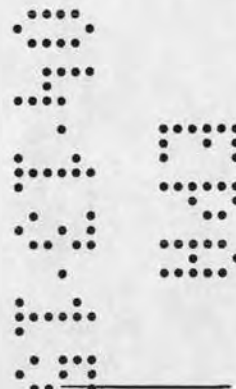
Cheryl R. Wagner
President
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Lori Kohler
Regulatory Associate
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7281
Fax: (302) 635-7295
Email: lori@wagnerreg.com

State Contacts (Any of the following individuals may be contacted by state regulatory authorities on our behalf)

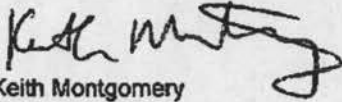
Barbarette Young-Henry
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7279
Fax: (302) 635-7295
Email: Barbarette@wagnerreg.com

Cheryl Wagner
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com



Authorization to contact these staff members within WRA, Inc remains in effect until such time that Prime Source, LLC provides notification in writing of any changes.

Respectfully submitted,



Keith Montgomery
Sales Manager

2013
JUL 24 12:12:41p
HALL RODGERS EIB



United States
Environmental Protection Agency
 Washington, DC 20460

Registration

OPP Identifier Number

Amendment☒ **Other****Application for Pesticide - Section I**

1. Company/Product Number 89442-23	2. EPA Product Manager Mindy Ondish	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Prime Source LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select	PM# 25	
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)**Notification to remove the New York state specific language off the first page.**

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
	If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		<input checked="" type="checkbox"/> Plastic	
* Certification must be submitted				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) HDPE lined bags	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2.5, 5 gallons		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other ___ adhesive backed label _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Cheryl Wagner		Title Agent for Prime Source, LLC		Telephone No. (Include Area Code) (302) 635-7289 Cheryl@wagnerreg.com	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received
2. Signature 		3. Title Agent for Prime Source, LLC.			
4. Typed Name Cheryl Wagner		5. Date April 9 th , 2015			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Prime Source, LLC, P.O. Box 640, Hockessin, DE 19707	EPA Registration Number/File Symbol 89442-23
Active Ingredient(s) and/or representative test compound(s) Bifenthrin	Date November 04, 2019
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Non-Food Crops	Product Name

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input checked="" type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
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SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date NOV. 04, 2019	Typed or Printed Name and Title Ogongi Ogongi, Authorized Agent
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Registration Review Label Submission

Submission ID: RRL-58868

Registration Review Label Submission Information

Submission Name	Bifen 7.9SC Select 89442-23
Case Number	7402-1
Case Name	Bifenthrin
Reason for Submitting	Label Amend
Initial Submission	No
Company Name	PRIME SOURCE, A DIVISION OF ALBAUGH LLC
Company Number	89442



RRL Documents


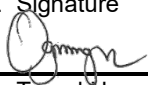
Document Type	Contains CBI?	Document Name	Product Registration Number
Submission Cover Letter	No	089442-00023.20210222.CoverLetter.pdf	
Form 8570-1 Pesticide Registration/Amendment Application	No	089442-00023.20210222.Bifen 7.9SC Select 8570-1.pdf	89442-23
Draft Label	No	089442-00023.20210222.DRAFT .pdf	89442-23
Draft Label	No	089442-00023.20210222.DRAFT Tracked Changes .pdf	89442-23



Submitter Information


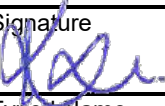
Submitter	Carolyn Miter
Submitted Date	02/23/2021



I certify, under penalty of law that the information provided in this document is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.


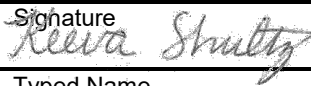
 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<div style="border: 1px solid black; padding: 2px;">Registration</div> <div style="border: 1px solid black; padding: 2px;">Amendment</div> <div style="border: 1px solid black; padding: 2px;"> <input checked="" type="checkbox"/> Other </div>	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 89442-23	2. EPA Product Manager Jacquelyn Herrick	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
4. Company/Product (Name) Prime Source, LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer ABN: Ike's Farm, Home, Garden Lawn Pest Killer	PM# 3		
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640, Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b) (I), my product is similar or identical in composition and labeling to: EPA Reg. No.: Product Name:		
Section - II			
<input type="checkbox"/> Amendment - Explain below.			
<input type="checkbox"/> Resubmission in response to Agency letter dated _____			
<input type="checkbox"/> Notification - Explain below.			
<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated <u>August 03, 2020</u>			
<input type="checkbox"/> "Me Too" Application.			
<input type="checkbox"/> Other - Explain below.			
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)			
Section - III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No <i>*Certification must be submitted</i>	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt. container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 16 oz., 1 qt., 1, 2.5, 5 gallons		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Ogongi Ogongi	Title Authorized Agent	Telephone No. (Include Area Code) (302) 239-7369 (ogongi@wagnerreg.com)	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received <div style="text-align: center; font-weight: bold;">(Stamped)</div>
2. Signature 	3. Title Authorized Agent		
4. Typed Name Ogongi Ogongi	5. Date January 8, 2021		


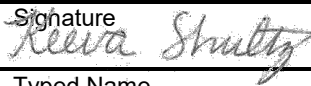
 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Registration Amendment Other	OPP Identifier Number
Application for Pesticide - Section I				
1. Company/Product Number 89442-23		2. EPA Product Manager Jacquelyn Herrick		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Prime Source, LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer ABN: Ike's Farm, Home, Garden Lawn Pest Killer		PM# 3		
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640, Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b) (I), my product is similar or identical in composition and labeling to: EPA Reg. No.: Product Name:		
Section - II				
<input type="checkbox"/> Amendment - Explain below. <input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated <u>August 03, 2020</u> <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below.				
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)				
Section - III				
1. Material This Product Will Be Packaged In:				
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No *Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 oz., 1 qt., 1, 2.5, 5 gallons		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				
Section - IV				
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)				
Name Ogongi Ogongi		Title Authorized Agent		Telephone No. (Include Area Code) (302) 239-7369 (ogongi@wagnerreg.com)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				6. Date Application Received (Stamped)
2. Signature 		3. Title Authorized Agent		
4. Typed Name Ogongi Ogongi		5. Date November 25, 2020		



 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 89442-23		2. EPA Product Manager Jacquelyn Herrick	
4. Company/Product (Name) Prime Source, LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer ABN: Ike's Farm, Home, Garden Lawn Pest Killer		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640, Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b) (I), my product is similar or identical in composition and labeling to: EPA Reg. No.: Product Name:	
Section - II			
<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input checked="" type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below.			
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) CSF Notification – Add Sources of Technical, Update Registrants of technicals, Correct Purity of Technical and add Producers <i>This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.</i>			
Section - III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No *Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 oz., 1 qt., 1, 2.5, 5 gallons	
		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Ogongi Ogongi		Title Authorized Agent Telephone No. (Include Area Code) (302) 239-7369 (ogongi@wagnerreg.com)	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Authorized Agent	
4. Typed Name Ogongi Ogongi		5. Date November 06, 2020	


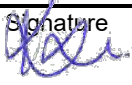
 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">Registration</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">Amendment</div> <div style="border: 1px solid black; padding: 2px;">Other</div>	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 89442-23		2. EPA Product Manager Jacquelyn Herrick	
4. Company/Product (Name) Prime Source, LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select ABN: Lawn Pest Killer		3. Proposed Classification <div style="display: flex; justify-content: space-between; align-items: center;"> <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted </div>	
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b) (I), my product is similar or identical in composition and labeling to: EPA Reg. No.: Product Name:	
Section - II			
<div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"> <input type="checkbox"/> Amendment - Explain below. </div> <div style="width: 50%;"> <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ </div> <div style="width: 50%;"> <input type="checkbox"/> Resubmission in response to Agency letter dated _____ </div> <div style="width: 50%;"> <input type="checkbox"/> "Me Too" Application. </div> <div style="width: 50%;"> <input checked="" type="checkbox"/> Notification - Explain below. </div> <div style="width: 50%;"> <input type="checkbox"/> Other - Explain below. </div> </div>			
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) <i>Label notification to add a descriptor to the first page and correct minor typographical errors. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.</i>			
Section - III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No *Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt. container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 oz., 1 qt., 1, 2.5, 5 gallons	
5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product			
6. Manner in Which Label is Affixed to Product <div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ </div> <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Katie Woodall	Title Agent for Prime Source, LLC	Telephone No. (Include Area Code) (302) 753-5305 (ktwoodall@wagnerreg.com)	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received <div style="border: 1px solid black; padding: 10px; width: 100px; margin: 0 auto;"> (Stamped) </div>
2. Signature 		3. Title Agent for Prime Source, LLC	
4. Typed Name Katie Woodall		5. Date July 24 th , 2019	


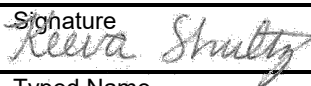
 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Registration Amendment Other	OPP Identifier Number
Application for Pesticide - Section I				
1. Company/Product Number 89442-23		2. EPA Product Manager Jacquelyn Herrick		3. Proposed Classification <input checked="" type="checkbox"/> None Restricted
4. Company/Product (Name) Prime Source, LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select ABN: Lawn Pest Killer ABN: Ike's Farm, Home, Garden Lawn Pest Killer		PM# <div style="text-align: center;">3</div>		
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:		
Section - II				
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification - Explain below. </div> <div style="width: 45%;"> <input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated September 27th, 2018 <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below. </div> </div>				
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)				
Section - III				
1. Material This Product Will Be Packaged In:				
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags	
* Certification must be submitted				
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 oz., 1 qt., 1, 2.5, 5 gallons		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; padding: 2px;"> <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled </div> <div style="border: 1px solid black; padding: 2px;"> <input type="checkbox"/> Other ___adhesive backed label_____ </div> </div>				
Section - IV				
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)				
Name Katie Woodall		Title Agent for Prime Source, LLC		Telephone No. (Include Area Code) (302) 753-5305 (ktwoodall@wagnerreg.com)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				6. Date Application Received <div style="border: 1px solid black; padding: 10px; width: 100px; margin: 0 auto;"> (Stamped) </div>
2. Signature 		3. Title Agent for Prime Source, LLC		
4. Typed Name Katie Woodall		5. Date November 5 th , 2019		


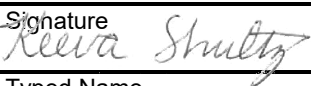
 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Registration Amendment Other	OPP Identifier Number
Application for Pesticide - Section I				
1. Company/Product Number 89442-23		2. EPA Product Manager Catherine Aubee		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Prime Source, LLC / Bifen 7.9SC Select; ABN: Bifen 7.9F Select, ABN: Lawn Pest Killer		PM# 10		
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:		
Section - II				
<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input checked="" type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below.				
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) CSF Notification to add sources of technical and producers as Alternate 5-7 CSFs, and update numbering for Alt. CSF 8-9. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.				
Section - III				
1. Material This Product Will Be Packaged In:				
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags	
* Certification must be submitted				
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2.5, 5 gallons		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other ___adhesive backed label_____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				
Section - IV				
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)				
Name Keeva Shultz		Title Agent for Prime Source, LLC		Telephone No. (Include Area Code) (302) 635-7281 (keeva@wagnerreg.com)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				6. Date Application Received (Stamped)
2. Signature 		3. Title Agent for Prime Source, LLC		
4. Typed Name Keeva Shultz		5. Date August 29, 2019		



 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input checked="" type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 89442-23		2. EPA Product Manager Catherine Aubee	
4. Company/Product (Name) Prime Source, LLC / Bifen 7.9SC Select; ABN: Bifen 7.9F Select, ABN: Lawn Pest Killer		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:	
Section - II			
<input checked="" type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below.			
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) CSF amendment to add a new formulation as Alternate #10 CSF. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.			
Section - III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No * Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2.5, 5 gallons	
		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Other ___ adhesive backed label _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled	
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Keeva Shultz		Title Agent for Prime Source, LLC Telephone No. (Include Area Code) (302) 635-7281 (keeva@wagnerreg.com)	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Agent for Prime Source, LLC	
4. Typed Name Keeva Shultz		5. Date August 29, 2019	



 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Registration Amendment Other	OPP Identifier Number
Application for Pesticide - Section I				
1. Company/Product Number 89442-23		2. EPA Product Manager Anna Briley		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Prime Source, LLC Bifen 7.9SC Select; ABN: Bifen 7.9F Select, ABN: Lawn Pest Killer		PM# 10		
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:		
Section - II				
<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Final printed labels in response to Agency letter dated _____				
<input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application.				
<input checked="" type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below.				
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) CSF Notification to update the source of technical with the new EPA Reg. No. in Alt. #1 & #4 CSF and add an additional source of technical as Alt. #9 & #10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.				
Section - III				
1. Material This Product Will Be Packaged In:				
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags	
* Certification must be submitted				
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2.5, 5 gallons		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other ___ adhesive backed label _____		
Section - IV				
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)				
Name Keeva Shultz		Title Agent for Prime Source, LLC		Telephone No. (Include Area Code) (302) 635-7281 (keeva@wagnerreg.com)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				6. Date Application Received (Stamped)
2. Signature 		3. Title Agent for Prime Source, LLC		
4. Typed Name Keeva Shultz		5. Date June 24, 2019		



 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Registration Amendment Other	OPP Identifier Number
Application for Pesticide - Section I				
1. Company/Product Number 89442-23		2. EPA Product Manager Richard Gebken		3. Proposed Classification <input checked="" type="checkbox"/> None Restricted
4. Company/Product (Name) Prime Source, LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select ABN: Lawn Pest Killer		PM# 10		
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:		
Section - II				
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification - Explain below. </div> <div style="width: 45%;"> <input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated September 27th, 2018 <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below. </div> </div>				
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)				
Section - III				
1. Material This Product Will Be Packaged In:				
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags	
* Certification must be submitted				
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 oz., 1 qt., 1, 2.5, 5 gallons		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled </div> <input type="checkbox"/> Other ___ adhesive backed label _____				
Section - IV				
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)				
Name Katie Woodall		Title Agent for Prime Source, LLC		Telephone No. (Include Area Code) (302) 753-5305 (ktwoodall@wagnerreg.com)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				6. Date Application Received (Stamped)
2. Signature 		3. Title Agent for Prime Source, LLC		
4. Typed Name Katie Woodall		5. Date April 1 st , 2019		



 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Registration Amendment Other	OPP Identifier Number
Application for Pesticide - Section I				
1. Company/Product Number 89442-23		2. EPA Product Manager Richard Gebken		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Prime Source, LLC Bifen 7.9SC Select; ABN: Bifen 7.9F Select, ABN: Lawn Pest Killer		PM# 10		
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:		
Section - II				
<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Final printed labels in response to Agency letter dated _____				
<input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application.				
<input checked="" type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below.				
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) CSF Notification to add additional producers to the Basic & Alternate 1-3 CSFs. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.				
Section - III				
1. Material This Product Will Be Packaged In:				
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags	
* Certification must be submitted				
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2.5, 5 gallons		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other ___ adhesive backed label _____		
Section - IV				
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)				
Name Keeva Shultz		Title Agent for Prime Source, LLC		Telephone No. (Include Area Code) (302) 635-7281 (keeva@wagnerreg.com)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				6. Date Application Received (Stamped)
2. Signature 		3. Title Agent for Prime Source, LLC		
4. Typed Name Keeva Shultz		5. Date January 28, 2019		


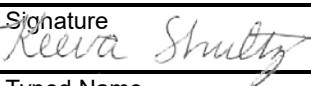
 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Registration Amendment Other	OPP Identifier Number
Application for Pesticide - Section I				
1. Company/Product Number 89442-23		2. EPA Product Manager Richard Gebken		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Prime Source, LLC Bifen 7.9SC Select; ABN: Bifen 7.9F Select, ABN: Lawn Pest Killer		PM# 10		
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:		
Section - II				
<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input checked="" type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below.				
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) CSF Notification to add sources of technical and producers as Alternate 4-8 CSFs. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.				
Section - III				
1. Material This Product Will Be Packaged In:				
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No * Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2.5, 5 gallons		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other ____ adhesive backed label _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				
Section - IV				
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)				
Name Keeva Shultz		Title Agent for Prime Source, LLC		Telephone No. (Include Area Code) (302) 635-7281 (keeva@wagnerreg.com)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				6. Date Application Received (Stamped)
2. Signature 		3. Title Agent for Prime Source, LLC		
4. Typed Name Keeva Shultz		5. Date October 11, 2018		

 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Registration Amendment Other	OPP Identifier Number
Application for Pesticide - Section I				
1. Company/Product Number 89442-23		2. EPA Product Manager Richard Gebken		3. Proposed Classification <input checked="" type="checkbox"/> None Restricted
4. Company/Product (Name) Prime Source, LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select ABN: Lawn Pest Killer		PM# 10		
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:		
Section - II				
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification - Explain below. </div> <div style="width: 45%;"> <input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated May 11, 2018 <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below. </div> </div>				
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)				
Section - III				
1. Material This Product Will Be Packaged In:				
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt. container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags	
* Certification must be submitted				
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 oz., 1 qt., 1, 2.5, 5 gallons		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled </div> <input type="checkbox"/> Other ___ adhesive backed label _____				
Section - IV				
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)				
Name Barbarette Young-Henry		Title Agent for Prime Source, LLC		Telephone No. (Include Area Code) (302) 635-7279 (barbarett@wagnerreg.com)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				6. Date Application Received (Stamped)
2. Signature 		3. Title Agent for Prime Source, LLC		
4. Typed Name Barbarette Young-Henry		5. Date September 14, 2018		

 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Registration Amendment Other	OPP Identifier Number
Application for Pesticide - Section I				
1. Company/Product Number 89442-23		2. EPA Product Manager Richard Gebken		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Prime Source, LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select ABN: Lawn Pest Killer		PM# 10		
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:		
Section - II				
<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input checked="" type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below.				
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) Add the additional Alternate Brand Name – "Ike's Farm, Home, Garden Lawn Pest Killer" This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.				
Section - III				
1. Material This Product Will Be Packaged In:				
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No * Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 oz., 1 qt., 1, 2.5, 5 gallons		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Other ___ adhesive backed label _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		
Section - IV				
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)				
Name Katie Woodall		Title Agent for Prime Source, LLC		Telephone No. (Include Area Code) (302) 753-5305 (ktwoodall@wagnerreg.com)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				6. Date Application Received <div style="text-align: center; font-weight: bold;">(Stamped)</div>
2. Signature 		3. Title Agent for Prime Source, LLC		
4. Typed Name Katie Woodall		5. Date August 9, 2018		

 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<div style="border: 1px solid black; padding: 2px; text-align: center;"> <input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other </div>	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 89442-23		2. EPA Product Manager Richard Gebken	
4. Company/Product (Name) Prime Source, LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select ABN: Lawn Pest Killer		3. Proposed Classification <div style="display: flex; justify-content: space-between; align-items: center;"> <input checked="" type="checkbox"/> None <div style="border: 1px solid black; padding: 2px;">Restricted</div> </div>	
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:	
Section - II			
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification - Explain below. </div> <div style="width: 45%;"> <input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated May 11, 2018 <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below. </div> </div>			
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)			
Section - III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt. container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
* Certification must be submitted			
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 oz., 1 qt., 1, 2.5, 5 gallons	
		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; padding: 2px; text-align: center;"> <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled </div> <div style="border: 1px solid black; padding: 2px; text-align: center;"> <input type="checkbox"/> Other ___ adhesive backed label _____ </div> </div>			
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Barbarette Young-Henry		Title Agent for Prime Source, LLC Telephone No. (Include Area Code) (302) 635-7279 (barbarette@wagnerreg.com)	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received <div style="border: 1px solid black; padding: 10px; width: 100px; margin: 0 auto;"> (Stamped) </div>
2. Signature 		3. Title Agent for Prime Source, LLC	
4. Typed Name Barbarette Young-Henry		5. Date June 25, 2018	

 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Registration Amendment Other	OPP Identifier Number
Application for Pesticide - Section I				
1. Company/Product Number 89442-23		2. EPA Product Manager Richard Gebken		3. Proposed Classification <input checked="" type="checkbox"/> None Restricted
4. Company/Product (Name) Prime Source, LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select		PM# 10		
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:		
Section - II				
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below. </div> <div style="width: 45%;"> <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below. </div> </div>				
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) Notification to correct minor typographical errors & add the additional Alternate Brand Name – Lawn Pest Killer This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.				
Section - III				
1. Material This Product Will Be Packaged In:				
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt. container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags	
* Certification must be submitted				
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 oz., 1 qt., 1, 2.5, 5 gallons		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> Lithograph <input type="checkbox"/> Other ____adhesive backed label____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled </div>				
Section - IV				
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)				
Name Katie Woodall		Title Agent for Prime Source, LLC		Telephone No. (Include Area Code) (302) 753-5305 ktwoodall@wagnerreg.com
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				6. Date Application Received (Stamped)
2. Signature 		3. Title Agent for Prime Source, LLC		
4. Typed Name Katie Woodall		5. Date March 15 th , 2018		

 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Registration Amendment Other	OPP Identifier Number
Application for Pesticide - Section I				
1. Company/Product Number 89442-23		2. EPA Product Manager Richard Gebken		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Prime Source, LLC Bifen 7.9SC Select; ABN: Bifen 7.9F Select		PM# 10		
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:		
Section - II				
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below. </div> <div style="width: 48%;"> <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below. </div> </div>				
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) CSF Notification to add additional producers to the Basic & Alternate 1-3 CSFs. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.				
Section - III				
1. Material This Product Will Be Packaged In:				
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags	
* Certification must be submitted				
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2.5, 5 gallons		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <div style="display: flex; justify-content: space-between;"> <div style="width: 40%;"> <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled </div> <div style="width: 60%;"> <input type="checkbox"/> Other ___ adhesive backed label _____ </div> </div>				
Section - IV				
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)				
Name Keeva Shultz		Title Agent for Prime Source, LLC		Telephone No. (Include Area Code) (302) 635-7281 (keeva@wagnerreg.com)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				6. Date Application Received (Stamped)
2. Signature 		3. Title Agent for Prime Source, LLC		
4. Typed Name Keeva Shultz		5. Date March 8, 2018		

 United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 89442-23		2. EPA Product Manager Elizabeth Fertich	
4. Company/Product (Name) Prime Source, LLC Bifen 7.9SC Select; ABN: Bifen 7.9F Select		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:	
Section - II			
<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input checked="" type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below.			
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) CSF Notification to add additional producers to the Basic & Alternate 1-3 CSFs. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.			
Section - III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No * Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2.5, 5 gallons	
		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Other ___ adhesive backed label _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled	
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Keeva Shultz		Title Agent for Prime Source, LLC	Telephone No. (Include Area Code) (302) 635-7281 (keeva@wagnerreg.com)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Agent for Prime Source, LLC	
4. Typed Name Keeva Shultz		5. Date December 1, 2017	



United States
Environmental Protection Agency
 Washington, DC 20460

Registration

OPP Identifier Number

Amendment

Other

Application for Pesticide - Section I

1. Company/Product Number 89442-23	2. EPA Product Manager Kable Bo Davis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Prime Source LLC Bifen 7.9SC Select; ABN: Bifen 7.9F Select	PM# 3	
5. Name and Address of Applicant (Include Zip Code) Prime Source LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Notification to add additional producer.

Therefore, the company name, address, & EPA Reg. No. for this active has been updated to reflect the transferred product information. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags		
* Certification must be submitted If "Yes" No. per If "Yes" No. per Unit Packaging wgt. container Package wgt. container					
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2.5, 5 gallons		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			Other ___ adhesive backed label _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Kt Woodall		Title Agent for Prime Source LLC		Telephone No. (Include Area Code) (302) 635-7289 (ktwoodall@wagnerreg.com)	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Agent for Prime Source LLC			
4. Typed Name Kt Woodall		5. Date January 25, 2017			

 United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/>	Registration	OPP Identifier Number
	<input type="checkbox"/>	Amendment	
	<input checked="" type="checkbox"/>	Other	

Application for Pesticide - Section I

1. Company/Product Number 89442-23	2. EPA Product Manager Kable Bo Davis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Prime Source LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select	PM# <div style="text-align: center; font-size: 1.2em;">3</div>	
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:	

Section - II

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
--	---

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Notification to add Alternate #3. Additional Source of TGA. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III**1. Material This Product Will Be Packaged In:**

Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
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*** Certification must be submitted**

3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 1, 2.5, 5 gallons	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled </div> <div style="width: 50%;"> <input type="checkbox"/> Other ___adhesive backed label_____ </div> </div>		

Section - IV**1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)**

Name Kt Woodall	Title Agent for Prime Source, LLC	Telephone No. (Include Area Code) (302) 635-7289 (ktwoodall@wagnerreg.com)
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Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature 	3. Title Agent for Prime Source, LLC.	6. Date Application Received <div style="font-size: 1.2em; font-weight: bold;">(Stamped)</div>
4. Typed Name Kt Woodall	5. Date October 19 th , 2016	

 <div style="margin-left: 20px;"> United States Environmental Protection Agency Washington, DC 20460 </div>	<input type="checkbox"/>	Registration	OPP Identifier Number
	<input type="checkbox"/>	Amendment	
	<input checked="" type="checkbox"/>	Other	

Application for Pesticide - Section I

1. Company/Product Number 89442-23	2. EPA Product Manager Kable Bo Davis	3. Proposed Classification <input checked="" type="checkbox"/> None Restricted
4. Company/Product (Name) Prime Source, LLC / Bifen 7.9F Select	PM# 3	
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:

Section - II

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated <u>August 19, 2015</u> <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
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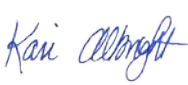
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Updated address change.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt. container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
* Certification must be submitted			
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 1, 2.5, 5 gallons	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <div style="display: flex; justify-content: space-between;"> <div style="text-align: center;"> <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled </div> <div style="text-align: center;"> <input type="checkbox"/> Other ____ adhesive backed label _____ </div> </div>			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Kari Albright	Title Agent for Prime Source, LLC	Telephone No. (Include Area Code) (302) 635-7289 kari.albright@wagnerreg.com	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received <div style="text-align: center;">(Stamped)</div>
2. Signature 	3. Title Agent for Prime Source, LLC		
4. Typed Name Kari Albright	5. Date September 23, 2016		

 <div style="margin-left: 20px;"> United States Environmental Protection Agency Washington, DC 20460 </div>		Registration	OPP Identifier Number
		Amendment	
	<input checked="" type="checkbox"/>	Other	

Application for Pesticide - Section I

1. Company/Product Number 89442-23	2. EPA Product Manager Kable Bo Davis	3. Proposed Classification <input checked="" type="checkbox"/> None Restricted
4. Company/Product (Name) Prime Source LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select	PM# 3	
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:

Section - II

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
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Explanation: Use additional page(s) if necessary. (For Section I and Section II.)**Notification to add additional producer to CSFs.**

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III**1. Material This Product Will Be Packaged In:**


Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt. container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
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*** Certification must be submitted**

3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 1, 2.5, 5 gallons	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <div style="display: flex; justify-content: space-around;"> <div> <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled </div> <div> <input type="checkbox"/> Other ____ adhesive backed label ____ </div> </div>		

Section - IV**1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)**

Name Cheryl Wagner	Title Agent for Prime Source, LLC	Telephone No. (Include Area Code) (302) 635-7289 Cheryl@wagnerreg.com
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Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent for Prime Source, LLC.	
4. Typed Name Cheryl Wagner	5. Date June 24, 2016	

 <div style="margin-left: 20px;"> United States Environmental Protection Agency Washington, DC 20460 </div>		Registration	OPP Identifier Number
		Amendment	
	<input checked="" type="checkbox"/>	Other	

Application for Pesticide - Section I

1. Company/Product Number 89442-23	2. EPA Product Manager Kable Bo Davis	3. Proposed Classification <input checked="" type="checkbox"/> None Restricted
4. Company/Product (Name) Prime Source LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select	PM# 3	
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:

Section - II

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
--	---

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)**Notification to add additional producer to CSFs.**

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III**1. Material This Product Will Be Packaged In:**


Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
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* **Certification must be submitted**

3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 1, 2.5, 5 gallons	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <div style="display: flex; justify-content: space-around;"> <div> <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled </div> <div> <input type="checkbox"/> Other ___ adhesive backed label _____ </div> </div>		

Section - IV**1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)**

Name Cheryl Wagner	Title Agent for Prime Source, LLC	Telephone No. (Include Area Code) (302) 635-7289 Cheryl@wagnerreg.com
-----------------------	--------------------------------------	--

Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent for Prime Source, LLC.	
4. Typed Name Cheryl Wagner	5. Date June 10 th , 2016	



United States
Environmental Protection Agency
 Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Prime Source LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707	EPA File Symbol/Registration Number 89442-23
	Product Name Bifen 7.9SC Select
	Date of Confidential Statement of Formula (EPA Form 8570-4) 01/25/2017

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Bifenthrin

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement.

That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Bifenthrin		
Signature 	Name and Title Ogongi Ogongi, Agent	Date 11/06/2020



United States
Environmental Protection Agency
 Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Prime Source LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707	EPA File Symbol/Registration Number 89442-23
	Product Name Bifen 7.9SC Select
	Date of Confidential Statement of Formula (EPA Form 8570-4) 11/06/2020

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Bifenthrin

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement.

That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Bifenthrin		
Signature	Name and Title Ogongi Ogongi, Agent	Date 11/06/2020

November 25, 2020

Document Processing Desk
Attn: Jacquelyn Herrick, PM 3
Registration Division
U.S. Environmental Protection Agency
Office of Pesticide Programs (7505P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501



**Subject: Bifen 7.9SC Select – EPA Reg. No. 89442-23 - ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer;
ABN: Ike's Farm, Home, Garden Lawn Pest Killer.
FPL**

Dear Ms. Herrick,

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC (EPA Co. 89442), respectfully submits the enclosed FPL as required by the EPA letter dated August 03, 2020. In support of this request, enclosed are the following documents:

- Letter from Prime Source LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Final Printed Label

Thank you in advance for your efforts in reviewing this submission. Please do not hesitate to contact me by email at ogongi@wagnerreg.com or by phone at 302-239-7369 should you have any questions.

Respectfully submitted,



Ogongi Ogongi
Agent for Prime Source, LLC

Enclosures

November 06, 2020

Document Processing Desk (NOTIF)
Attn: Jacquelyn Herrick, PM 3
Registration Division
U.S. Environmental Protection Agency
Office of Pesticide Programs (7505P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501



**Subject: Bifen 7.9SC Select – EPA Reg. No. 89442-23 - ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer;
ABN: Ike's Farm, Home, Garden Lawn Pest Killer
CSF Notification – Add Sources of Technical, Update Registrants of technicals, Correct Purity of
Technical and add Producers**

Dear Ms. Herrick,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC (EPA Co. 89442), is submitting a CSF notification adding a new source of technical as Alt. 11 and 12 CSF. Additional revisions include;

- Update registrant's name and address in the Basic, Alt. 2, Alt. 3, Alt. 5, Alt. 8 and Alt. 9 CSFs.
- Update EPA registration number of the technical in the Basic, Alt. 2, Alt. 8 and Alt. 9 CSFs.
- Correct purity of technical in Alt. 9 CSF
- Add new producers to all CSFs.

This submission supersedes a pending action that was submitted on August 29, 2019.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formula (8570-4) – Basic - Alternate # 12
- Formulators Exemption (8570-27)

Thank you in advance for your efforts in reviewing this submission. Please do not hesitate to contact me by email at ogongi@wagnerreg.com or by phone at 302-239-7369 should you have any questions.

Respectfully submitted,

Ogongi Ogongi
Agent for Prime Source, LLC

Enclosures

December 10, 2019

Document Processing Desk (AMEND)
Attn: Jacquelyn Herrick, PM 3
Registration Division
U.S. Environmental Protection Agency
Office of Pesticide Programs (7505P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501



**Subject: Bifen 7.9SC Select – EPA Reg. No. 89442-23 - ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer;
ABN: Ike's Farm, Home, Garden Lawn Pest Killer
Label Amendment**

Dear Ms. Herrick,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC (EPA Co. 89442), is submitting a label amendment adding Optional Marketing Statements and minor label revisions to match the Me-Too label - EPA Reg. No. 53883-118.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Amendment (8570-1)
- Formulator's Exemption Statement (8570-27)
- Data Matrix, EPA internal and public copies (8570-35)
- Copy of the label – highlighted and clean version
- EPA Certification Statement Form 8570-34

Thank you in advance for your efforts in reviewing this submission. Please do not hesitate to contact me by email at ogongi@wagnerreg.com or by phone at 302-239-7369 should you have any questions.

Respectfully submitted,



Ogongi Ogongi
Agent for Prime Source, LLC

Enclosures

November 05, 2019

Document Processing Desk (AMEND)
Attn: Jacquelyn Herrick, PM 3
Registration Division
U.S. Environmental Protection Agency
Office of Pesticide Programs (7505P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501



**Subject: Bifen 7.9SC Select – EPA Reg. No. 89442-23 - ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer;
ABN: Ike's Farm, Home, Garden Lawn Pest Killer
Label Amendment**

Dear Ms. Herrick,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC (EPA Co. 89442), is submitting a label amendment adding Optional Marketing Statements and minor label revisions to match the Me-Too label - EPA Reg. No. 53883-118.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Amendment (8570-1)
- Formulator's Exemption Statement (8570-27)
- Data Matrix, EPA internal and public copies (8570-35)
- Copy of the label – highlighted and clean version

Thank you in advance for your efforts in reviewing this submission. Please do not hesitate to contact me by email at ogongi@wagnerreg.com or by phone at 302-239-7369 should you have any questions.

Respectfully submitted,



Ogongi Ogongi
Agent for Prime Source, LLC

Enclosures

Electronic Submission

May 18, 2021

Document Processing Desk (AMENDMENT)
Ms. Jacquelyn Herrick (PM 03)
Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard (South Bldg)
2777 South Crystal Dr.
Arlington, VA 22202

Re: Bifen 7.9SC Select

EPA Reg. No. 89442-023

Dear Ms. Herrick,

The enclosed submission consists of proposed Alternate CSFs #5-7 for the above referenced product. The purpose of the submission is to allow for the use of additional [REDACTED] registered technical source. Some inerts supplier names were changed to "commodity" as they are approved in the commodity list. [REDACTED]

[REDACTED] A proposed new formulation is also include for CSF #7.

Please don't hesitate to contact me if you have any questions.

Best Regards,

Kerly Pastor

Kerly Pastor
Regulatory Manager
Albaugh, LLC
kerlyp@albaughllc.com

Product ingredient source information may be entitled to confidential treatment
Manufacturing process information may be entitled to confidential treatment

Submitted Electronically

November 5th, 2019

Document Processing Desk (NOTIF)
ATTN: Jacquelyn Herrick (PM 3)
Registration Division (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



Subject: Bifen 7.9SC Select – EPA Registration No. 89442-23
ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer; ABN: Ike's Farm, Home, Garden Lawn Pest Killer
Final Print Label Submission

Dear Ms. Herrick,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed final print label as required by the EPA letter dated September 27th, 2018. In support of this request, enclosed are the following documents:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Copy of the final market label

If you have any questions about this submission, please contact the undersigned at (302) 753-5305 or ktwoodall@wagnerreg.com.

Respectfully submitted,



Katie Woodall
Agent for Prime Source, LLC

Enclosures

August 29, 2019

Document Processing Desk (NOTIF)
ATTN: Catherine Aubee, PM 10
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



**Re: Bifen 7.9SC Select; ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer - EPA Reg. No. 89442-23
CSF Notification**

Dear Ms. Aubee,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed notification to:

1. Add additional sources of technical and additional producers as Alternate CSFs #5-7,
2. And update the sequence of numbering for Alternate CSFs #8-9 (previously approved as Alternate CSFs #9-10, June 24, 2019) for the above referenced product.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formulas –Alternates #5-9
- Formulators Exemption (8570-27)

Please feel free to contact me via email at keeva@wagnerreg.com or telephone at (302) 635-7281.

Respectfully submitted,

Keeva Shultz
Agent for Prime Source, LLC

Enclosures

Submitted Electronically via CDX Portal

August 29, 2019

Document Processing Desk (AMEND)
ATTN: Catherine Aubee, PM 10
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



**Re: Bifen 7.9SC Select; ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer - EPA Reg. No. 89442-23
CSF Amendment**

Dear Ms. Aubee,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed amendment to add a new formulation as Alternate #10 CSF to the above reference product. All inert ingredients have been approved by the EPA Inert division.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Amendment (8570-1)
- Confidential Statement of Formulas –Alternate #10
- Formulators Exemption (8570-27)

Please feel free to contact me via email at keeva@wagnerreg.com or telephone at (302) 635-7281.

Respectfully submitted,

A handwritten signature in black ink, reading 'Keeva Shultz', is positioned above the printed name.

Keeva Shultz
Agent for Prime Source, LLC

Enclosures

July 24th, 2019

Document Processing Desk (NOTIF)
Attn: Jacquelyn Herrick, PM 3
Registration Division
U.S. Environmental Protection Agency
Office of Pesticide Programs (7505P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501



**Subject: Bifen 7.9SC Select – EPA Reg. No. 89442-23
Label Notification**

Dear Ms. Herrick,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC (EPA Co. 89442), is submitting a label notification to add a descriptor to the first page and correct minor typographical errors.


This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Copy of the label – highlighted and clean version

Thank you in advance for your efforts in reviewing this submission. Please do not hesitate to contact me by email at ktwoodall@wagnerreg.com or by phone at 302-753-5305 should you have any questions.

Respectfully submitted,



Katie Woodall
Agent for Prime Source, LLC

Enclosures

June 24, 2019

Document Processing Desk (NOTIF)
ATTN: Anna Briley, PM 10
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



**Re: Bifen 7.9SC Select; ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer - EPA Reg. No. 89442-23
CSF Notification**

Dear Ms. Briley,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed notification to update the source of technical with the new EPA Reg. No. in Alt. #1 & #4 CSF and add an additional source of technical as Alt. #9 & #10 for the above referenced product. This submission will supersede the submission made on Oct. 11, 2018 to add Alt. #4 CSF and the submission made on Jan. 28, 2019 to add producers to Alt. #1 CSF. All changes and previous changes made on these CSFs have been highlighted.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formulas –Alternates #1, 4, 9-10
- Formulators Exemption (8570-27)

Please feel free to contact me via email at keeva@wagnerreg.com or telephone at (302) 635-7281.

Respectfully submitted,

Keeva Shultz
Agent for Prime Source, LLC

Enclosures

Submitted Electronically

April 1st, 2019

Document Processing Desk (NOTIF)
ATTN: Richard Gebken (PM 10)
Registration Division (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



Re: Bifen 7.9SC Select
ABN: Bifen 7.9F Select
ABN: Lawn Pest Killer
EPA Registration No. 89442-23
Final Print Label Submission

Dear Mr. Gebken,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed final print label as required by the EPA letter dated September 27th, 2018. In support of this request, enclosed are the following documents:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Copy of the final market label

If you have any questions about this submission, please contact the undersigned at (302) 753-5305 or ktwoodall@wagnerreg.com.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Katie", is positioned above the printed name and title.

Katie Woodall
Agent for Prime Source, LLC

Enclosures

January 28, 2019

Document Processing Desk (NOTIF)
ATTN: Richard Gebken, PM 10
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



Dear Mr. Gebken,

**Re: Bifen 7.9SC Select; ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer - EPA Reg. No. 89442-23
CSF Notification**

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed notification adding additional producers to the basic and alternates 1-3 Confidential Statements of Formulas for the above referenced product.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formulas – Basic & Alternates #1 - 3
- Formulators Exemption (8570-27)

Please feel free to contact me via email at keeva@wagnerreg.com or telephone at (302) 635-7281.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Keeva Shultz". The signature is fluid and cursive, with the first name "Keeva" being more prominent than the last name "Shultz".

Keeva Shultz
Agent for Prime Source, LLC

Enclosures

October 11, 2018

Document Processing Desk (NOTIF)
ATTN: Richard Gebken, PM 10
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



Dear Mr. Gebken,

**Re: Bifen 7.9SC Select; ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer - EPA Reg. No. 89442-23
CSF Notification**

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed notification to add sources of technical and additional producers through the addition of Alternate Confidential Statements of Formulas 4-8 for the above referenced product.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formulas –Alternates #4-8
- Formulators Exemption (8570-27)

Please feel free to contact me via email at keeva@wagnerreg.com or telephone at (302) 635-7281.

Respectfully submitted,

Keeva Shultz
Agent for Prime Source, LLC

Enclosures

Submitted Electronically

September 14, 2018

Document Processing Desk (NOTIF)
ATTN: Richard Gebken (PM 10)
Registration Division (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



**Re: Bifen 7.9SC Select
ABN: Bifen 7.9F Select
ABN: Lawn Pest Killer
EPA Registration No. 89442-23
Final Print Label Submission**

Dear Mr. Gebken,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed final print label as required by the EPA letter dated May 11, 2018. In support of this request, enclosed are the following documents:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Copy of the final market label

If you have any questions about this submission, please contact the undersigned at (302) 635-7279 or barbarette@wagnerreg.com.

Respectfully submitted,



Barbarette Young-Henry
Agent for Prime Source, LLC

Enclosures

Submitted Electronically

August 9, 2018

Document Processing Desk (NOTIF)
ATTN: Richard Gebken (PM 10)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



Re: Bifen 7.9SC Select ABN: Bifen 7.9F Select; ABN: Lawn Past Killer, EPA Registration No. 89442-23
Notification of an additional Alternate Brand Name

Dear Mr. Gebken,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed label notification to add the additional Alternate Brand Name – **Ike's Farm, Home, Garden Lawn Pest Killer**. In support of this submission, the following documents are being submitted via the CDX Portal:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Formulators Exemption Statement (8570-27)
- A copy of the label - Clean & Highlighted

Please feel free to contact me via email at ktwoodall@wagnerreg.com or telephone at (302) 753-5305.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Katie Woodall", is positioned above the printed name.

Katie Woodall
Agent for Prime Source, LLC

Enclosures

Submitted Electronically

June 25, 2018

Document Processing Desk (NOTIF)
ATTN: Richard Gebken (PM 10)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



**Re: Bifen 7.9SC Select
ABN: Bifen 7.9F Select
ABN: Lawn Pest Killer
EPA Registration No. 89442-23
Final Print Label Submission**

Dear Mr. Gebken,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed final print label as required by the EPA letter dated May 11, 2018. In support of this request, enclosed are the following documents:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Copy of the final market label

If you have any questions about this submission, please contact the undersigned at (302) 635-7279 or barbarette@wagnerreg.com.

Respectfully submitted,



Barbarette Young-Henry
Agent for Prime Source, LLC

Enclosures

Submitted Electronically

March 15th, 2018

Document Processing Desk (NOTIF)
ATTN: Richard Gebken (PM 10)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



Re: Bifen 7.9SC Select ABN: Bifen 7.9F Select, EPA Registration No. 89442-23
Notification of an additional Alternate Brand Name

Dear Mr. Gebken,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed label notification to correct minor typographical errors and to add the additional Alternate Brand Name – **Lawn Pest Killer**. In support of this submission, the following documents are being submitted via the CDX Portal:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Formulators Exemption Statement (8570-27)
- A copy of the label - Clean & Highlighted

Please feel free to contact me via email at ktwoodall@wagnerreg.com or telephone at (302) 753-5305.

Respectfully submitted,



Katie Woodall
Agent for Prime Source, LLC

Enclosures

March 8, 2018

Document Processing Desk (NOTIF)
ATTN: Richard Gebken, PM 10
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



Dear Mr. Gebken,

Re: Bifen 7.9SC Select; ABN: Bifen 7.9F Select - EPA Reg. No. 89442-23
Adding Additional Producers – CSF Notification

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed notification adding additional producers to the basic and alternates 1-3 Confidential Statements of Formulas for the above referenced product.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formulas – Basic & Alternates #1 - 3
- Formulators Exemption (8570-27)

Please feel free to contact me via email at keeva@wagnerreg.com or telephone at (302) 635-7281.

Respectfully submitted,

A handwritten signature in black ink that reads "Keeva Shultz". The signature is fluid and cursive, with the first name "Keeva" and last name "Shultz" clearly distinguishable.

Keeva Shultz
Agent for Prime Source, LLC

Enclosures

Submitted Electronically

December 1, 2017

Document Processing Desk (NOTIF)
ATTN: Elizabeth Fertich (PM 3)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



Dear Ms. Fertich,

Re: Bifen 7.9SC Select; ABN: Bifen 7.9F Select - EPA Reg. No. 89442-23
Adding Additional Producers – CSF Notification

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed notification adding additional producers to the basic and alternates 1-3 Confidential Statements of Formulas for the above referenced product.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formulas – Basic & Alternates #1 - 3
- Formulators Exemption (8570-27)

Please feel free to contact me via email at keeva@wagnerreg.com or telephone at (302) 635-7281.

Respectfully submitted,

Keeva Shultz
Agent for Prime Source, LLC

Enclosures

Submitted Electronically

January 25, 2017

Document Processing Desk (NOTIF)
ATTN: Kable Bo Davis (PM 3)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



Dear Mr. Davis,

Re: Bifen 7.9SC Select; ABN: Bifen 7.9F Select - EPA Reg. No. 89442-23
Adding Additional Producer – CSF Notification

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, respectfully submits the enclosed notification to add an additional producer to the Confidential Statement of Formulas for the subject product.

[REDACTED] Therefore, the company name, address, & EPA Reg. No. for this active has been updated to reflect the transferred product information. The enclosed Confidential Statement of Formulas will replace all previously approved CSFs. In support of this submission, the following documents are attached:

- Letter from Prime Source LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formulas – Basic & Alternates #1 - 3
- Formulators Exemption (8570-27)
- NPIRS confirmation of Registration Transfer - [REDACTED]

Please feel free to contact me via email at ktwoodall@wagnerreg.com or telephone at (302) 635-7289.

Respectfully submitted,



Kt Woodall
Agent for Prime Source LLC

Enclosures

October 19th, 2016



Document Processing Desk (NOTIF)
ATTN: Kable Bo Davis (PM 3)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Dear Mr. Davis,

Re: Bifen 7.9SC Select ABN: Bifen 7.9F Select, EPA Reg. No. 89442-23
Additional Source of TGA I - Notification

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, respectfully submits the enclosed notification to add an alternate (#3) Confidential Statement of Formula for the subject product. This notification includes an additional source of TGA I. No other changes have been made to the formulation. Enclosed for the Agency's review are the following:

In support of this request, the following documents and studies are attached:

- Letter from Prime Source LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formula - Alternate #3
- Formulators Exemption (8570-27)

Please feel free to contact me via email at ktwoodall@wagnerreg.com or telephone at (302) 635-7289.

Respectfully submitted,



Kt Woodall
Agent for Prime Source LLC

Enclosures

Submitted Electronically



September 23, 2016

Document Processing Desk
ATTN: Kable Bo Davis (PM 3)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Re: Bifen 7.9SC Select, EPA Reg. No. 89442-23 - Final Print

Dear Mr. Davis,

Wagner Regulatory Associates, Inc. respectfully submits the enclosed final print label for the subject product in response to the EPA letter dated August 19, 2015 along with an updated address.

If you have any questions about this submission, please contact the undersigned at (302) 635-7289 or kari.albright@wagnerreg.com.

Respectfully submitted,

A handwritten signature in blue ink, which appears to read "Kari Albright", is positioned below the "Respectfully submitted," text.

Kari Albright
Agent for Prime Source LLC

Enclosure

June 24, 2016



Document Processing Desk (NOTIF)
ATTN: Kable Bo Davis (PM 3)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Re: Bifen 7.9SC Select ABN: Bifen 7.9F Select, EPA Reg. No. 89442-23
Notification of Revised Confidential Statement of Formulas

Dear Mr. Davis:

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, respectfully notifies the Agency that an additional production facility has been added to Box 2 of the Basic, Alternate 1, and Alternate 2 Confidential Statement of Formulas. These revised CSFs will replace all current EPA approved CSFs dated June 10th, 2015.

In support of this request, the following documents and studies are attached:

- Letter from Prime Source LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Revised CSFs

Please feel free to contact me via email at cheryl@wagnerreg.com or telephone at (302) 635-7289.

Respectfully submitted,

A handwritten signature in black ink that reads "Cheryl R. Wagner". The signature is written in a cursive, flowing style.

Cheryl Wagner
Agent for Prime Source LLC

Enclosures

June 10th, 2016



Document Processing Desk (NOTIF)
ATTN: Kable Bo Davis (PM 3)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Re: Bifen 7.9SC Select ABN: Bifen 7.9F Select, EPA Reg. No. 89442-23
Notification of Revised Confidential Statement of Formulas

Dear Mr. Davis:

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, respectfully notifies the Agency that an additional production facility has been added to Box 2 of the Basic, Alternate 1, and Alternate 2 Confidential Statement of Formulas. These revised CSFs will replace all current EPA approved CSFs dated June 10th, 2015.

In support of this request, the following documents and studies are attached:

- Letter from Prime Source LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Revised CSFs

Please feel free to contact me via email at cheryl@wagnerreg.com or telephone at (302) 635-7289.

Respectfully submitted,

Cheryl Wagner
Agent for Prime Source LLC

Enclosures



Prime Source, LLC
PO BOX 250
10025 Hwy 264 Alternate
Middlesex, NC 27557
Phone 252-235-0043

December 9, 2020

To: Whom it May Concern

Re: Prime Source, LLC EPA# 89442 - Letter of Authorization

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding State and/or Federal regulatory matters as determined by Prime Source, LLC. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

James Wagner
Email: james@wagnerreg.com
Phone: 302-635-7290

S. K. Theodorakis
Email: tim.t@wagnerreg.com
Phone: 302-510-0039

Carrie Nolan
Email: carrie@wagnerreg.com
Phone: 302-635-7632

Katie Woodall
Email: ktwoodall@wagnerreg.com
Phone: 302-753-5305

Keeva Shultz
Email: keeva@wagnerreg.com
Phone: 302-635-7281

Rachel Hardie
Email: rachel@wagnerreg.com
Phone: 302-635-7289

Julie Kozlowski
Email: julie@wagnerreg.com
Phone: 302-635-7279

Ogongi Ogongi
Email: ogongi@wagnerreg.com
Phone: 302-239-7369

Catherine Parmeter
Email: catherine@wagnerreg.com
Phone: 410-920-8756

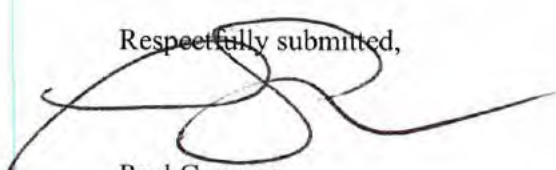
Annette Marine
Email: annette.marine@wagnerreg.com
Phone: 302-635-7283

Correspondence can be addressed to any of the above employees at:

Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates, Inc. should you have any questions.

Respectfully submitted,



Paul Conover
Regulatory and Quality Assurance Manager

cc: WRA, Inc.



Prime Source, LLC
PO BOX 250
10025 Hwy 264 Alternate
Middlesex, NC 27557
Phone 252-235-0043

October 27, 2020

To: Whom it May Concern

Re: Prime Source, LLC EPA# 89442 - Letter of Authorization

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding State and/or Federal regulatory matters as determined by Prime Source, LLC. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

James Wagner
Email: james@wagnerreg.com
Phone: 302-635-7290

S. K. Theodorakis
Email: tim.t@wagnerreg.com
Phone: 302-510-0039

Carrie Nolan
Email: carrie@wagnerreg.com
Phone: 302-635-7632

Katie Woodall
Email: ktwoodall@wagnerreg.com
Phone: 302-753-5305

Keeva Shultz
Email: keeva@wagnerreg.com
Phone: 302-635-7281

Rachel Hardie
Email: rachel@wagnerreg.com
Phone: 302-635-7289

Julie Kozlowski
Email: julie@wagnerreg.com
Phone: 302-635-7279

Ogongi Ogongi
Email: ogongi@wagnerreg.com
Phone: 302-239-7369

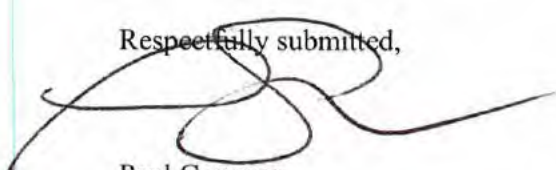
Catherine Parmeter
Email: catherine@wagnerreg.com
Phone: 410-920-8756

Correspondence can be addressed to any of the above employees at:

Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates, Inc. should you have any questions.

Respectfully submitted,



Paul Conover
Regulatory and Quality Assurance Manager

cc: WRA, Inc.



Prime Source, LLC
PO BOX 250
10025 Hwy 264 Alternate
Middlesex, NC 27557
Phone 252-235-0043

November 30, 2018

To: Whom it May Concern

Re: Prime Source, LLC 89442

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding state and/or federal regulatory matters as determined by Prime Source. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

James Wagner
Email: james@wagnerreg.com
Phone: 302-635-7290

Anna Armstrong
Email: anna@wagnerreg.com
Phone: 302-510-0039

Julie Kozlowski
Email: julie@wagnerreg.com
Phone: 302-635-7279

Katie Woodall
Email: ktwoodall@wagnerreg.com
Phone: 302-753-5305

Carrie Nolan
Email: carrie@wagnerreg.com
Phone: 302-635-7632

Rachel Hardie
Email: rachel@wagnerreg.com
Phone: 302-635-7289

Keeva Shultz
Email: keeva@wagnerreg.com
Phone: 302-635-7281

Laura Phelps
Email: laura@wagnerreg.com
Phone: 919-353-2439

Correspondence can be addressed to any of the above employees at:

Wagner Regulatory Associates
P. O. Box 640
Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates should you have any questions.

Respectfully submitted,

Prime Source, LLC - Chief Operating Officer

cc: WRA, Inc.

January 7, 2016

To: Whom it May Concern

Re: Prime Source LLC

This letter serves as notification that Prime Source LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding state and/or federal regulatory matters as determined by Prime Source LLC. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

James Wagner
Email: james@wagnerreg.com
Phone: 302-635-7290

Cheryl Wagner
Email: cheryl@wagnerreg.com
Phone: 302-635-7289

Carrie Nolan
Email: carrie@wagnerreg.com
Phone: 302-635-7632

Barbarette Young-Henry
Email: barbarette@wagnerreg.com
Phone: 302-635-7279


Kt Woodall
Email: ktwoodall@wagnerreg.com
Phone: 302-635-7281

Correspondence can be addressed to any of the above employees at:

Wagner Regulatory Associates
P. O. Box 640
Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates should you have any questions.

Respectfully submitted,



William A. Fassnacht
Prime Source LLC
Chief Operating Officer

cc: WRA, Inc.



Prime Source, LLC
PO BOX 250
10025 Hwy 264 Alternate
Middlesex, NC 27557
Phone 252-235-0043

September 19, 2019

To: Whom it May Concern

Re: Prime Source, LLC EPA# 89442 - Letter of Authorization

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding State and/or Federal regulatory matters as determined by Prime Source, LLC. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

James Wagner
Email: james@wagnerreg.com
Phone: 302-635-7290

Anna Armstrong
Email: anna@wagnerreg.com
Phone: 302-510-0039

Carrie Nolan
Email: carrie@wagnerreg.com
Phone: 302-635-7632

Katie Woodall
Email: ktwoodall@wagnerreg.com
Phone: 302-753-5305

Keeva Shultz
Email: keeva@wagnerreg.com
Phone: 302-635-7281

Rachel Hardie
Email: rachel@wagnerreg.com
Phone: 302-635-7289

Julie Kozlowski
Email: julie@wagnerreg.com
Phone: 302-635-7279

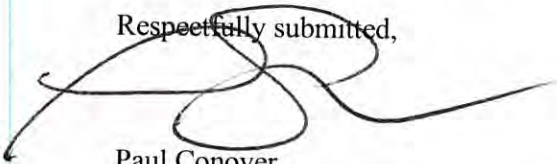
Ogongi Ogongi
Email: ogongi@wagnerreg.com
Phone: 302-239-7369

Correspondence can be addressed to any of the above employees at:

Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates, Inc. should you have any questions.

Respectfully submitted,



Paul Conover
Regulatory and Quality Assurance Manager

cc: WRA, Inc.



Prime Source, LLC
PO BOX 250
10025 Hwy 264 Alternate
Middlesex, NC 27557
Phone 252-235-0043

November 30, 2018

To: Whom it May Concern

Re: Prime Source, LLC 89442

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding state and/or federal regulatory matters as determined by Prime Source. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

James Wagner
Email: james@wagnerreg.com
Phone: 302-635-7290

Anna Armstrong
Email: anna@wagnerreg.com
Phone: 302-510-0039

Julie Kozlowski
Email: julie@wagnerreg.com
Phone: 302-635-7279

Katie Woodall
Email: ktwoodall@wagnerreg.com
Phone: 302-753-5305

Carrie Nolan
Email: carrie@wagnerreg.com
Phone: 302-635-7632

Rachel Hardie
Email: rachel@wagnerreg.com
Phone: 302-635-7289

Keeva Shultz
Email: keeva@wagnerreg.com
Phone: 302-635-7281

Laura Phelps
Email: laura@wagnerreg.com
Phone: 919-353-2439

Correspondence can be addressed to any of the above employees at:

Wagner Regulatory Associates
P. O. Box 640
Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates should you have any questions.

Respectfully submitted,

Prime Source, LLC - Chief Operating Officer

cc: WRA, Inc.



Prime Source, LLC
PO BOX 250
10025 Hwy 264 Alternate
Middlesex, NC 27557
Phone 252-235-0043

September 28, 2016

To: Whom it May Concern

Re: Prime Source, LLC 89442

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding state and/or federal regulatory matters as determined by Prime Source. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

James Wagner
Email: james@wagnerreg.com
Phone: 302-635-7290

Anna Armstrong
Email: anna@wagnerreg.com
Phone: 302-510-0039

Barbarette Young-Henry
Email: barbarette@wagnerreg.com
Phone: 302-635-7279

Katie Woodall
Email: ktwoodall@wagnerreg.com
Phone: 302-753-5305

Carrie Nolan
Email: carrie@wagnerreg.com
Phone: 302-635-7632

Rachel Hardie
Email: rachel@wagnerreg.com
Phone: 302-635-7289

Keeva Shultz
Email: keeva@wagnerreg.com
Phone: 302-635-7281

Correspondence can be addressed to any of the above employees at:

Wagner Regulatory Associates
P. O. Box 640
Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates should you have any questions.

Respectfully submitted,

Prime Source, LLC - Chief Operating Officer

cc: WRA, Inc.

January 7, 2016

To: Whom it May Concern

Re: Prime Source LLC

This letter serves as notification that Prime Source LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding state and/or federal regulatory matters as determined by Prime Source LLC. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

James Wagner
Email: james@wagnerreg.com
Phone: 302-635-7290

Cheryl Wagner
Email: cheryl@wagnerreg.com
Phone: 302-635-7289

Carrie Nolan
Email: carrie@wagnerreg.com
Phone: 302-635-7632

Barbarette Young-Henry
Email: barbarette@wagnerreg.com
Phone: 302-635-7279


Kt Woodall
Email: ktwoodall@wagnerreg.com
Phone: 302-635-7281

Correspondence can be addressed to any of the above employees at:

Wagner Regulatory Associates
P. O. Box 640
Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates should you have any questions.

Respectfully submitted,



William A. Fassnacht
Prime Source LLC
Chief Operating Officer

cc: WRA, Inc.



Prime Source, LLC
PO BOX 250
10025 Hwy 264 Alternate
Middlesex, NC 27557
Phone 252-235-0043

September 28, 2016

To: Whom it May Concern

Re: Prime Source, LLC 89442

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding state and/or federal regulatory matters as determined by Prime Source. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

James Wagner
Email: james@wagnerreg.com
Phone: 302-635-7290

Cheryl Wagner
Email: cheryl@wagnerreg.com
Phone: 302-635-7289

Anna Armstrong
Email: anna@wagnerreg.com
Phone: 302-510-0039

Barbarette Young-Henry
Email: barbarette@wagnerreg.com
Phone: 302-635-7279

Carrie Nolan
Email: carrie@wagnerreg.com
Phone: 302-635-7632

Katie Woodall
Email: ktwoodall@wagnerreg.com
Phone: 302-635-7283

Keeva Shultz
Email: keeva@wagnerreg.com
Phone: 302-635-7281

Correspondence can be addressed to any of the above employees at:

Wagner Regulatory Associates
P. O. Box 640
Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates should you have any questions.

Respectfully submitted,

Prime Source, LLC - Chief Operating Officer

cc: WRA, Inc.